

EXHIBIT “B”

Evelyn Cintron
2/14/2023

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EVELYN CINTRON,	:	
	:	19-CV-4078
Plaintiff	:	
	:	
-VS-	:	
	:	
CITY OF PHILADELPHIA,	:	
	:	
Defendant	:	

* * * * *

TUESDAY, FEBRUARY 14, 2023

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Videotape deposition of EVELYN CINTRON, was taken at the law offices of Mincey, Fitzpatrick, Ross, 1650 Liberty Place, Philadelphia, Pennsylvania, before Renee Schumann, a Notary Public of the State of New Jersey and Notary Public of the Commonwealth of Pennsylvania, on the above date, commencing at 10:13 a.m.

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2/14/2023

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2

3 WITNESS PAGE

4 EVELYN CINTRON,

5 (Witness Sworn.)

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THE VIDEOTAPE OPERATOR: This begins media labeled number one of the remote video recorded deposition of Ms. Evelyn Cintron in the matter of Evelyn Cintron, plaintiff versus City of Philadelphia, defendants, In The United States District Court for the Eastern District of Pennsylvania. Case 19-CV-4078. Today's date is February the 14, 2023. The time is approximately 10:13 a.m.

My name is Shala Hollis, I'm the legal video specialist from Lexitas Reporting Services. The court reporter is Ms. Renee Schumann also in association with Lexitas Reporting Services.

Will all counsel present please introduce yourselves for the record.

MS. ULAK: Good morning, Sharon Ulak on behalf of the City of Philadelphia and Joseph Sullivan.

MR. GREEN: Isaac Green on behalf of plaintiff Evelyn Cintron.

MR. GOLDEN: Kevin Golden of O'Hagen Meyer for defendant Police Athletic League.

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1 THE VIDEOTAPE OPERATOR: All right,
2 thank you. Will the court reporter please
3 swear in the witness.

4 * * * * *

5 EVELYN CINTRON, having been duly sworn
6 according to law, was examined and testified
7 as follows:

8 * * * * *

9 THE VIDEOTAPE OPERATOR: Counsel, you
10 may proceed.

11 * * * * *

12 DIRECT EXAMINATION

13 * * * * *

14 BY MS. ULAK:

15 Q. Good morning, Ms. Cintron. My name is
16 Sharon Ulak, I represent the City of Philadelphia and
17 Joseph Sullivan in a lawsuit you have brought. We're
18 actually here today to continue your deposition, this
19 is part two of your deposition, we started part one
20 on October 28th of 2022.

21 When you began that deposition, Kevin
22 Golden had given you some instructions, I am going to
23 give you the same instructions so they may sound a
24 little bit repetitive, but it's important that we go

1 over them again, and there are some new instructions
2 here because we are on Zoom.

3 So the court reporter here is taking
4 down everything that you're saying and she's making a
5 transcript out of it. For this reason it is
6 important that only one of us speaks at a time. In
7 everyday conversation people tend to interrupt each
8 other. You might know where I'm going with my
9 question and you might be able to answer it before I
10 complete my question, and if we were just having a
11 chat that would be fine, but because we have to make
12 a transcript and we have to go back and read it
13 later, it's not going to read well if we're
14 interrupting each other. So I just ask that you let
15 me finish my question before you give me a response
16 and I will do my best to let you finish your answer
17 before I ask my next question.

18 If you don't understand a question that
19 I ask you, please tell me that you don't understand
20 the question and I will do my best to clarify or
21 rephrase it. If you don't know an answer to
22 something, you can tell me you don't know. If you
23 don't remember, you can tell me you don't remember.
24 Those are all perfectly fine responses.

1 I don't want you guessing at anything.
2 If you answer a question of mine I'm going to assume
3 that you understood the question and that the answer
4 that you are giving is as truthful and accurate as it
5 can be.

6 If at any time you need to take a
7 break, you should tell me you need to take a break
8 and we can take a break, I just ask that if I've
9 asked you a question that, you know, the answer
10 before we proceed with taking a break and if you --
11 yeah, if you have any need to stop at any point, just
12 let me know.

13 And as a reminder, even though we're on
14 Zoom today and it's a little bit different than the
15 last time we met, you are still under oath and I do
16 want to ask if -- you know, before we proceed do you
17 have any anybody in the room with you today?

18 A. No.

19 Q. Okay. And are you referring to any
20 documents or notes today?

21 A. No.

22 Q. Okay. You testified previously, we had
23 discussed this -- you previously testified on October
24 28th of 2022, do you remember testifying that day?

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1 A. Yes.

2 Q. And after you gave that testimony, did
3 you have the chance to look at your transcript at
4 all?

5 A. No.

6 Q. Okay.

7 A. I never received it.

8 Q. Okay. So just so we're clear, you've
9 never read that transcript before, right?

10 A. No.

11 Q. Okay. And you were under oath that day
12 and you remain under oath today.

13 Do you understand all the instructions
14 I've given you?

15 A. Yes. Yes.

16 Q. Okay. Sorry, I was getting some
17 feedback I wasn't sure if your counsel was trying to
18 chime in with something, I apologize.

19 That is sometimes the challenge with
20 technical difficulties in doing this on Zoom. So if
21 at any point there's some sort of a technical error
22 especially if you don't hear a question of mine and
23 it might cut out, you might get interrupted, just
24 tell me and I will re-ask the question. Okay?

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1 A. Okay.

2 Q. Okay. And I'm sorry, just bear with me
3 one second here. All right.

4 And I know this is a continuation of
5 your deposition that we took it a very long time ago
6 and I think especially at the beginning you might
7 hear some repetitive questions from the first time
8 around and, you know, for that I'm not trying to
9 trick you, I'm not trying to trip you up. I'm trying
10 to reestablish where we were when we had left off.

11 So, Ms. Cintron, you have brought this
12 lawsuit against the City of Philadelphia and Joseph
13 Sullivan and it largely concerns your time as the
14 commanding officer of the Police Athletic League in
15 the Philadelphia Police Department.

16 Am I -- am I understanding that
17 correctly?

18 A. Yes.

19 Q. Okay. And when did you -- when did you
20 become the commanding officer of the Police Athletic
21 League?

22 A. I believe it was the beginning of 2018.

23 Q. Okay.

24 A. It was 2018.

1 Q. Okay.

2 A. Or '17, I can't recall the exact date.

3 Q. Okay, and that's fine. If I didn't
4 make that clear you can approximate.

5 For approximately how long were you the
6 commanding officer of PAL?

7 A. Two years.

8 Q. And how many deputy commissioners did
9 you report to while you were the commanding officer
10 of PAL?

11 A. I originally reported to Deputy
12 Commissioner Paterson and then I started reporting to
13 Deputy Commissioner Sullivan.

14 Q. Do you recall for approximately how
15 long you reported to Deputy Commissioner Paterson?

16 A. For about two years.

17 Q. And then you reported to Deputy
18 Commissioner Sullivan for about a year?

19 A. Yes.

20 Q. Okay. And when you started at PAL,
21 what were your duties and responsibilities as the
22 commanding officer?

23 A. As the commanding officer my
24 instructions were to work -- that Ted Qualli and I

1 would work together to run the Police Athletic League
2 in terms of all operational and day-to-day
3 programming. Everything that had to do with PAL, Ted
4 Qualli and I were supposed to do together as
5 equals -- as equals, yeah.

6 Q. Okay. And just for clarity of the
7 record, who is Ted Qualli?

8 A. Ted Qualli was the director of the
9 Police Athletic League.

10 Q. Okay. And when you say the day-to-day
11 operations, what do you mean by that?

12 A. Well, we were supposed to work in all
13 matters pertaining to, you know, developing programs,
14 finances, putting together events. Basically
15 everything to run the organization.

16 Q. When you say finances, did you retain
17 any responsibilities for budgeting?

18 A. When I originally got there we would
19 work on the budget together but things changed
20 because Ted Qualli and the Board would change the
21 budget to what they wanted regardless of what we
22 discussed in -- at PAL.

23 Q. Okay.

24 A. Between Ted and I and the staff when we

1 worked on the budget.

2 Q. Okay. In terms of the budgeting, who
3 funds PAL; where does PAL get its money from?

4 A. PAL, the Philadelphia Police Department
5 pays the officers' salary.

6 Q. Yes.

7 A. And the Police Athletic League, the
8 nonprofit is based on fundraising.

9 Q. Okay. You say the City of Philadelphia
10 paid the police officers' salaries, what do the
11 police officers do?

12 A. The police officers are assigned to the
13 centers or to an administrative position to assist in
14 the day-to-day tasks that need to be done, as well as
15 run the programs at the center with the children.

16 Q. Okay. Does the Philadelphia Police
17 Department provide any funding to PAL outside of the
18 staffing support?

19 A. I don't know.

20 Q. Okay, that's fine. As commanding
21 officer of PAL, did you have responsibility to
22 approve a budget for PAL?

23 A. They would put a certain amount in the
24 commander's budget.

1 Q. Okay. In terms of funding for
2 programming though, did you have any responsibility
3 for allocating that budget?

4 A. The programs team, we had a programs
5 team and they would allocate certain amount for the
6 different programs to be used for those programs.

7 Q. And who did the programs team work for?

8 A. They reported to Ted, but I was in
9 charge of the programs team.

10 Q. Were they -- well, again I ask, who did
11 they work for?

12 A. They worked for the Police Athletic
13 League, but there were some officers on the -- on the
14 meetings too, at the meetings also.

15 Q. Okay. And what did the officers do at
16 those meetings?

17 A. Well, when I arrived there, we develop,
18 you know, like meetings so they can coordinate the
19 events with the officers who were supposed to carry
20 out those programs.

21 Q. Okay. But the people on that programs
22 team worked for PAL?

23 A. Yes, they worked for PAL but I was in
24 charge of the program, and therefore, I would work

1 with them, not Ted, to run certain programs.

2 Q. When you say to run certain programs,
3 does that involve staffing support?

4 A. Well, it's a basically to ensure that
5 the money that's allocated to the program is spent
6 properly and that we carry out the programs according
7 to what we planned.

8 Q. As the commander officer of PAL, did
9 you have any audit responsibilities over the PAL
10 budget?

11 A. Yes.

12 Q. Can you explain that more, what did you
13 do?

14 A. I had to make sure that the budget was
15 not overspent and that everybody stayed on track in
16 terms of spending according to what was on the
17 budget.

18 Q. Did you work with anybody at PAL when
19 you were doing that?

20 A. Yes, I would consult with Sunny Li,
21 sometimes with Ted about what was going on when we
22 had -- when we would speak about programs.

23 Q. And who is Sunny Li?

24 A. They were fully aware of what was going

1 on with the -- with the budget because we would, you
2 know, I would let them know what was going on.

3 Q. Okay. And I'm sorry, I didn't mean to
4 interrupt you, who is Sunny Li?

5 A. Sunny Li was the chief financial
6 officer at PAL.

7 Q. When you were appointed commanding
8 officer of PAL, did you receive any documentation
9 that would outline your duties and responsibilities
10 as the commander officer?

11 A. No.

12 Q. Did you receive any special training to
13 be the commanding officer at PAL?

14 A. No. I had the experience from being
15 management for almost 20 years.

16 Q. And can you maybe elaborate a little
17 bit more on what you mean by the experience from
18 being management; what were you doing before you
19 became the commanding officer of PAL?

20 A. I was the second in command for 25th
21 District, administrative lieutenant and the five
22 squad lieutenant in charge of the five squad team.

23 Q. How long were you at the 25th before
24 you became the commanding officer of PAL?

1 A. Two years.

2 Q. Did you receive any training in budget
3 management when you became the commanding officer of
4 PAL?

5 A. Sunny Li and I sat down and she
6 explained the budget to me and how it works.

7 Q. Okay. Did you receive any training in
8 auditing when you became the commanding officer of
9 PAL?

10 A. No, but I did auditing at the 25th, you
11 know, District to make sure that everything is -- is,
12 you know, correct.

13 Q. How would you conduct an audit at the
14 25th District, what were you doing?

15 A. What do you mean, in the 25th District?

16 Q. Yes.

17 A. Oh, like if -- like when we were doing
18 the certification for the -- for the Taliah (ph.) and
19 they asked me to do an audit over everything so that
20 I know where or how rather what was correct and what
21 was incorrect as far as the operations room and the
22 cell room and the policy that I wrote was implemented
23 in order for us to get our certification.

24 Q. Did you ever do any budget auditing

1 before you became the commanding officer of PAL?

2 A. No.

3 Q. Excuse me. Okay. So when you were
4 appointed commanding officer of PAL, you said that
5 you had worked with Ted Qualli and it was your
6 understanding that the two of you would work as
7 equals at PAL; is that correct?

8 A. Yes. That's what Ted Qualli told me,
9 Commissioner Ross told me and Bernie Prazencia and
10 Ron Rabena.

11 Q. Okay. And as part of your duties and
12 responsibilities as commanding officer the PAL, how
13 often would you meet with PAL Board members?

14 A. Only at the general meetings. I met
15 one time with -- I mean with Bernie Prazencia at his
16 office with Ted which was the week I started, and
17 then after they told me that I would be at those
18 meetings but then after that I wasn't invited to
19 those meetings.

20 Q. Were those monthly meetings, bimonthly
21 meetings, do you know?

22 A. They were monthly meetings and
23 sometimes they would meet more often depending on the
24 stuff -- whatever was going on at PAL.

1 Q. Was the monthly meeting a general board
2 meeting?

3 A. No. They had general board meetings
4 and I would get invited to those.

5 Q. Okay.

6 A. But I was never invited to the
7 decision-making meetings.

8 Q. Did they not make decisions at the
9 monthly board -- general board meeting?

10 A. No, it was to present what we had
11 accomplished.

12 Q. Okay.

13 A. Or what was coming.

14 Q. What types of decisions were made at
15 the decision-making meetings?

16 A. Ted Qualli would come from the meetings
17 and state things that we needed to do based on the
18 instructions he received from those meetings. So it
19 could be anything. It could have been anything.

20 Q. Can you give an example?

21 A. Yes. Ted said -- would come from the
22 meetings and say in reference to this budget, you
23 know, he would explain like we need to narrow down on
24 this program because we're going over our budget or

1 we're doing this or we're doing that and he would
2 explain what the Board wanted at that time. It would
3 be about anything, so to pinpoint it it's like hard
4 to pinpoint because it would be about many things.

5 Q. Did you go to the monthly general board
6 meetings?

7 A. Yes.

8 Q. Did you ever miss any meetings?

9 A. No.

10 Q. If you were to have missed a meeting
11 would anybody have gone in your place?

12 A. No.

13 Q. Okay. So let's back up again and let's
14 talk about when you were first appointed to become a
15 commanding officer of PAL.

16 When you started as commanding officer,
17 what -- what did you do? Can you tell us again a
18 little bit about your first week there?

19 A. When I first arrived at PAL, we decided
20 to go visit all the PAL centers so that I can get to
21 know the -- one, get to know the officers working at
22 those PAL centers; and, two, to look at facilities to
23 see what's going on in terms of all, you know, all
24 the backlog. There was a backlog of things that

1 needed to be done at the centers. So we went to do
2 an inspection of the centers and to meet the
3 officers.

4 Q. And what happened when you were
5 inspecting the centers?

6 A. We visited a few centers the first day.
7 By the time we got to Wissinoming PAL, that center
8 itself was in real deplorable conditions and even
9 though it's my practice to learn about the unit that
10 I'm working in and not make hasty decisions in terms
11 of a command decision, I -- when I went there, I had
12 no choice but to make a decision to close Wissinoming
13 PAL down because of the conditions of the center.

14 Q. Okay. When did you close Wissinoming
15 PAL?

16 A. This was when I first arrived at PAL
17 like that -- within that first or second week of me
18 being the commanding officer.

19 Q. Okay, and why did you close the center?

20 A. The first thing when I walked into that
21 center I immediately got sick because there was a
22 strong odor of what I believe was mold and I couldn't
23 take the smell of the building, so I had to run out
24 and throw up. I was throwing up outside and I was

1 followed by the then maintenance person Fran -- Fran
2 (sic) I think his name was, and shortly thereafter
3 Ted Qualli came out, Sergeant Fells came out and
4 Sunny Li came outside and when the sergeant was
5 attempting to talk to me about the center and I
6 looked over Ted Qualli was signaling him not to say
7 anything.

8 Q. I'm sorry, you cut out a little bit.
9 I'm to sorry to interrupt you. Who said not to say
10 anything, you just cut out a little bit?

11 A. Ted Qualli was signaling, I caught him
12 with my peripheral, the sergeant putting his finger
13 to his mouth as shush, don't say anything and he was
14 going like this telling him to stop talking about it,
15 like don't say anything.

16 Q. And just for the record you're
17 indicating with your hand towards your neck sort of
18 making a cutting off motion?

19 A. Yes.

20 Q. Okay.

21 A. He was going like that (indicating).

22 Q. Mouth to lips.

23 A. Right. Right. So Ted Qualli began to
24 tell me that the center -- that the kids were all

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1 doing events and the center was closed and that's why
2 it had a foul -- probably a foul smell. At that
3 point we had to leave because of the way that I was
4 feeling and I went back a few -- and I think it was
5 next day or two days later and I met with Officer
6 Younger who was the officer assigned to that center,
7 at which time Officer Younger took me around the
8 center with a mask on to show me the conditions of
9 the center and there was mold in the classroom, the
10 closet, a wall in front of the closet. There was
11 condensation in the gym. There was puddles of water
12 in different parts of the gym, and he gave me about
13 an inch thick of paperwork which contained memos that
14 he had been turning in and pictures for the previous
15 three years reporting the conditions of the center to
16 Ted Qualli, Sunny Li and the warden.

17 And he told me that it used to be an
18 active center but that the kids were getting sick and
19 parents were complaining the kids were getting asthma
20 and respiratory problems and they stopped bringing
21 the kids to the center, and he himself had gotten
22 respiratory problems for working in the center. And
23 he gave me a copy of the paperwork and asked me can I
24 please do something about these conditions, and he

1 explained to me that they told him that they couldn't
2 close the center down because they were getting
3 funding and explained to me that the funding that
4 they were getting they were telling the donors that
5 it was an active center, but the center was not
6 active because only about 13 kids were attending the
7 center because they didn't have anywhere to go after
8 school and that's the only reason why they were
9 coming, but the hundred plus kids that used to attend
10 stopped coming because of the conditions of the
11 center.

12 In the walkway between the gym and the
13 classroom there was a sinkhole and they had a piece
14 of wood with a rug on top so the kids could walk over
15 it to the classroom.

16 Q. Okay.

17 A. So given the fact that it happened
18 three years since this was going on, I felt that I
19 needed to protect the children and the staff that
20 entered that building; and, therefore, I made the
21 decision to close the center down.

22 Q. Okay. In terms of making the decision
23 to close the center down, is that something you had
24 the authority to do as the commanding officer of PAL?

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1 A. Before I made the decision I spoke to
2 Deputy Commissioner Paterson who told me that that
3 would be a great decision to close it down because
4 after explaining to him what was going on he said
5 that's the only thing you can do is -- the safety of
6 the kids and the safety of the officers are more
7 important than funding. So he instructed me that --
8 you know, he was giving me permission to shut it
9 down.

10 Q. Okay. So I appreciate your answer, but
11 I don't think you quite answered my question. As the
12 commanding officer of PAL did you have the authority
13 to shutdown a PAL center?

14 A. Yes.

15 Q. Okay. Was that in any writing or
16 anything like that?

17 A. It's in my oath.

18 Q. And can you explain further?

19 A. My oath is to protect the community and
20 leaving a center open knowing that it has mold and
21 getting people sick would not have been a good
22 choice, a good decision.

23 Q. Okay. So in your oath -- so it's your
24 testimony that your oath as a police officer is what

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1 gave --

2 A. To protect.

3 Q. -- you the authority --

4 A. Yes.

5 Q. -- to protect, that's what gives you
6 authority to close the PAL center?

7 A. And as the commanding officer of PAL, I
8 have the authority to protect my officers and the
9 children, that's priority.

10 Q. Okay. Before you closed -- I just want
11 to make sure I'm understanding your testimony
12 correctly, before you closed the center down, you
13 contacted Deputy Commissioner Paterson?

14 A. Yes.

15 Q. And Deputy Commissioner Paterson
16 advised --

17 A. And I spoke to Ted Qualli and he agreed
18 at the time.

19 Q. Okay. So you spoke to Ted Qualli --
20 Qualli, excuse me, and you spoke with Deputy
21 Commissioner Paterson and they agreed to the decision
22 to shut the PAL center down?

23 A. Deputy Commissioner Paterson agreed to
24 shut the center down. When I spoke to Ted Qualli

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1 about it he said well, let's shut it down until we
2 found what's going on. But when we found out that it
3 would be a lot money to correct the problems he
4 attempted to reopen up the center by undermining my
5 decision and going to the sergeants and telling them
6 to reopen up the center without consulting me about
7 it.

8 Q. Okay.

9 A. When I back to the center, the officer
10 was there with a mask on trying to clean the mold so
11 that they could open the center. And when I asked
12 him why he was trying to open up the center, he said
13 because the sergeant said to reopen or Ted Qualli.
14 And I immediately called Ted Qualli and the sergeants
15 to come and meet me at Wissinoming PAL and I
16 instructed the sergeant that it was the final
17 decision to close the center down so we could fix the
18 problems to prevent the mold. And the sergeant told
19 me that Ted said to reopen it because they don't want
20 to lose funding.

21 When Ted came to the center he said the
22 same thing to me, he said they have a lot to lose in
23 terms of funding and we can't just be closing centers
24 down.

1 Q. Okay, and after that happened, did you
2 discuss the reopening of the center with Deputy
3 Commissioner Paterson?

4 A. No. We were trying to figure -- Ted
5 and I called the facilities team who came out, one of
6 the Board members scolded Ted Qualli in my presence
7 and told him you need to be ashamed of yourself that
8 this has been going on for three years and you didn't
9 think it was important to address this. And we
10 decided that we would try to find a solution to fix
11 the problems because we did need a center in that
12 community but not under those conditions.

13 Q. You mentioned that you met with a
14 facilities team, who was on the facilities team?

15 A. They're all Board members.

16 Q. Okay. You had also testified that
17 there is a custodian named Fran at the Wissinoming
18 Center, did I understand that correctly?

19 A. He is the -- he's the maintenance guy
20 at PAL.

21 Q. Okay.

22 A. I believe his name -- I forget his last
23 name, I'm sorry.

24 Q. It's okay.

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1 A. He works for PAL. He works for PAL and
2 he's like the maintenance manager.

3 Q. Okay. But to be clear, Fran works for
4 PAL?

5 A. Frank, I think it's Frank.

6 Q. Frank, I'm sorry, Frank works for PAL?

7 A. Yes.

8 Q. Okay. When did the Wissinoming Center
9 reopen?

10 A. It never reopened while I was there.

11 Q. It never reopened while you were there?

12 A. Nope, because they -- when we brought
13 the experts out, they found out there was a
14 structural problem coming from the outside and that
15 the water was coming in from the outside and unless
16 that was fixed, there was -- the problem was never
17 going to go away. And because PAL did not own the
18 building and the church is very limited on funds they
19 didn't have the money to fix it.

20 Q. You just referenced a church, who owned
21 that building?

22 A. The church owned the building. I don't
23 remember the names of the person who owns the
24 building, but a church was located in that building

1 and we were using their gym for the PAL center.

2 Q. Okay. To be clear, the City of
3 Philadelphia did not own that building?

4 A. No.

5 Q. Okay. Were you disciplined for
6 shutting the PAL center down?

7 A. No.

8 Q. We talked a little bit already about
9 funding for PAL, while you were the commanding
10 officer of PAL did you have any complaints about the
11 funding?

12 A. Yes.

13 Q. And what were those complaints?

14 A. We had a backlog of five years of --
15 (Technical difficulties.)

16 MS. ULAK: Hold on. Your attorney just
17 dropped off. We're going to hold on a second.

18 THE WITNESS: Okay.

19 MS. ULAK: We'll just go off the
20 record.

21 * * * * *

22 (Whereupon a discussion was held off
23 the record.)

24 * * * * *

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1 MS. ULAK: I stopped her. Ike, are you
2 back with us?

3 MR. GREEN: Yes, I am now. Can you
4 back it up about five -- about three or four
5 questions I think I missed.

6 MS. ULAK: Renee, do you mind repeating
7 the last question I asked.

8 THE COURT REPORTER: Off the record.

9 THE VIDEOTAPE OPERATOR: The time is
10 10:49 a.m. and we're off the record.

11 * * * * *

12 (Whereupon, an off the record
13 discussion was held.)

14 * * * * *

15 (Whereupon, the requested portion of
16 the testimony was read back by the court
17 reporter.)

18 * * * * *

19 THE VIDEOTAPE OPERATOR: The time is
20 10:50 a.m., we are back on the record.

21 MS. ULAK: Okay. I think, Renee, if
22 you don't mind, can you just repeat my last
23 question and then Ms. Cintron you can you
24 start to answer it.

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1 * * * * *

2 (Whereupon, the requested portion of
3 the testimony was read back by the court
4 reporter.)

5 * * * * *

6 THE WITNESS: There was a few things I
7 was concerned about because we had a backlog
8 of going back five years of deplorable
9 conditions at different PAL centers, and I
10 felt that they were spending money or putting
11 money in the budget for things that were not
12 conducive to get -- you know, they would take
13 from the budget to get things fixed to do
14 other things that -- or support other programs
15 that were not in the benefit of getting things
16 corrected at PAL in terms of like the
17 conditions at the centers.

18 So I could give you a good example,
19 there was -- there was a program that Nadirah
20 McCauley and Officer Little used to plan --
21 they would spend thousands of dollars on
22 designer pocketbooks.

23 BY MS. ULAK:

24 Q. Hang on, Ms. Cintron. I think you cut

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1 out again. You had mentioned Officer Little and
2 Nadirah McCauley I think was her last name?

3 A. Yes.

4 Q. Can go just kind of go back and pick up
5 from where -- from where you left off? I think your
6 internet connection might be a little bit fuzzy.

7 A. Okay. There was programs that they
8 were spending money where they shouldn't be spending
9 money. For instance, they were running a program
10 where they buy hundred of dollars of designer
11 pocketbooks and then they would also go buy cheaper
12 pocketbooks at let's say, you know, like wherever
13 they were buying them from.

14 Then they would have pocket bingo -- I
15 mean pocketbook bingo and they made sure that they
16 walked away with the designer purses and the kids
17 would win the cheaper purses at their little bingo
18 games. So I thought they were abusing that program
19 because it was to their benefit, not to the kids'
20 benefits -- benefit.

21 Q. And, Ms. Cintron, did you -- did you
22 make any complaints about that?

23 A. Yes, I had explained to Ted Qualli that
24 there was a lot of programs where it wasn't actually

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1 benefiting the kids and that we could redirect that
2 money to -- to, you know, to fix these facilities
3 that the buildings could be in better conditions.

4 I also felt that they were spending a
5 lot of money on repairing the headquarters. They
6 spent over a million dollars to repair -- to renovate
7 the PAL headquarters building, the new PAL
8 headquarters building which was a building that
9 belonged to a PAL member who donated the building to
10 PAL on a temporary basis for headquarters to use.

11 So I felt that they were spending all
12 this money for a building that eventually would go
13 back to the PAL Board member as opposed to using that
14 money for actual programs or to actual -- to fix the
15 centers so that the kids could be in safer
16 conditions.

17 Q. And you said you made complaints about
18 this to Ted?

19 A. The building was already done, but
20 there were still like -- another example I could give
21 you --

22 Q. No, Ms. Cintron, I'm sorry actually, I
23 want to back up. My question to you was you made
24 these complaints to Ted --

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1 A. Yes.

2 Q. -- did you make these complaints to
3 Ted?

4 A. Yes, and the Board members.

5 Q. And how would you make these
6 complaints?

7 A. I would talk to him about it. The
8 issue would come out of the different scenarios,
9 like, for instance, we -- there was an officer who
10 had one of the electrical plugs sparking fire and he
11 had to close down the homework room because of this
12 electrical problem and I hired an electrician or I
13 didn't hire the electrician, I spoke to Frank and
14 told him hey, we need to hire an electrician to
15 handle this and it took like five meetings for them
16 to say that we weren't going to hire an electrician
17 and they were going to send Sunny Li to inspect this
18 outlet. And my response was like why would Sunny Li
19 go there, Li is not an electrician, well, we needed
20 another electrician. And when I instructed Frank to
21 hire an electrician unbeknownst to me Ted cancelled
22 my request and redirected the team to go paint the
23 hallway at the PAL headquarters because it had some
24 scuff marks on it.

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1 So it was the lack of concern and
2 instead of prioritizing emergency over putting it
3 into the building to me was like crazy that he would
4 choose to cancel this electrician to fix a problem
5 that could have caused a fire in that building, and
6 he redirected the maintenance staff to go paint a
7 wall.

8 Q. Ms. Cintron, what building was it that
9 was having electrical problems?

10 A. It was I believe -- I can't recall
11 which building it was, but yeah, one of the
12 buildings, I think it was the building that Officer
13 Johnson was working in, whatever building he's
14 working in, that's the building that had the
15 electrical outlet problem.

16 Q. I'm sorry, the building who was working
17 in, you cut out again?

18 A. Officer Johnson was the officer that
19 brought that to our attention.

20 Q. Officer Johnson, what was his first
21 name?

22 A. I can't remember his first name.

23 Q. Okay.

24 A. It might be Daryl, Daryl Johnson.

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1 Q. Okay, yeah, I'm not trying to get you
2 to guess and I just know that Johnson is a common
3 last name in the police department, so I thought I
4 would try to narrow it down if we could.

5 So you would make complaints to Ted and
6 the Board and did you make complaints to anybody else
7 about this?

8 A. Yes. When Paterson was my deputy
9 commissioner, I would give him updates about what was
10 going on and he was aware that I was having concerns
11 for the safety and the maintenance at these buildings
12 and that a lot of my concerns were not taken serious
13 or ignored.

14 In this case with the electrical outlet
15 I felt that Ted was using his, you know, like his
16 authority to show that he had the final say on what
17 gets done and what doesn't get done.

18 Q. To be clear, what was Ted's title?

19 A. He was director of the Police Athletic
20 League.

21 Q. Aside from Deputy Commissioner
22 Paterson, did you make any complaints to any other
23 City of Philadelphia employees about your funding
24 concerns when it came to PAL centers?

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1 A. Deputy Commissioner Sullivan.

2 Q. And what complaints would you make to
3 Deputy Commissioner Sullivan?

4 A. I -- when he became deputy Paterson
5 instructed me to go to his office and update him on
6 everything that I had to spoke Paterson about. He
7 said I spoken to him, I gave him a rundown of
8 everything that went on at PAL and you need to go to
9 speak to him, you know, that way he knows what's
10 going on now that he's requested to take over PAL.

11 Q. And what did you tell Deputy
12 Commissioner Sullivan?

13 A. I sat down with him and I told him how
14 there was a constant opposition and power struggle
15 from Ted Qualli not wanting to or not being open to
16 getting some of these problems resolved and while we
17 needed things at the centers, he kept having parties,
18 planning parties that weren't necessary instead of
19 using those funds to make repairs and that's where we
20 had -- you know, I had concerns.

21 Q. And I want to be clear, these concerns
22 were about the facilities and the state of the
23 facilities, correct?

24 A. The deplorable conditions of the

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1 facilities. They were also about programming because
2 they had a lot -- they would put a lot of money into
3 like the golfing program. Some centers got more
4 funding than other centers and got preferential
5 treatment in terms of getting whatever it is they
6 needed done right away.

7 Q. Can you explain a little bit more about
8 the centers that got preferential treatment?

9 A. Yes, Rizzo PAL, the building had
10 problems -- I mean the roof had problems and even
11 though it was not within the budget, they were doing
12 a special fundraising to put a brand new roof at
13 Rizzo PAL even though the roof guy told us that it
14 was nothing to be concerned about right away. That
15 he could patch up the section that needed patching up
16 and that that would at least another 10 years before
17 they would have to put a new roof. But they decided
18 that they would, you know, do a special fundraising
19 to put a new roof in at Rizzo PAL. And the fact that
20 there was a five-year backlog of, you know, bad
21 conditions in the centers I felt that that was not
22 responsible of them to do.

23 They started renovating Rizzo PAL to do
24 a -- to do like a whole area for the equipment and

1 things like that, so they were remodeling Rizzo PAL
2 and what they said was that because the building
3 belonged to PAL, they rather invest the money in that
4 center than to fix stuff in other centers.

5 Q. The centers that had, to borrow your
6 phrase, deplorable conditions, were those centers
7 that were owned by PAL or were those centers owned by
8 other entities?

9 A. I believe they were owned by other
10 entities, except for Cozen. I think the only ones we
11 owned was Cozen PAL and Rizzo PAL.

12 Q. You had mentioned preferential
13 treatment in programming, can you talk a little bit
14 more about that?

15 A. Yes, for our Christmas parties we would
16 combine six to seven centers to have one big party,
17 that way we narrow down the amount of parties during
18 the holiday season while involving, you know, all the
19 centers. But with the exception of Rizzo PAL and
20 University of Penn PAL where they had their own
21 parties and got to invite like all the kids in their
22 center, all the kids in the center as opposed to
23 seven to 14 kids they would fit around to go to other
24 centers to have combined parties. There was programs

1 in some centers such as Rizzo PAL that they didn't
2 offer in other -- other centers.

3 Q. Like what?

4 A. The wrestling program was one of them
5 and the wrestling program would be allowed to leave
6 the state to do tournaments as well as being taken to
7 Disney World and they -- and this wrestling program
8 was not per se a PAL program, it was ran by an
9 outside wrestling program in a PAL center and -- who
10 had their own coach.

11 So basically they were facilitating the
12 outside program making it as falsely a PAL program
13 and while the other officers wanted to have a
14 basketball league that were able to do traveling
15 basketball, they were told that they couldn't have it
16 because PAL programs and kids could not leave the
17 Delaware Valley area. So what they allowed in one
18 center, they would not allow in other centers.

19 Q. But to be clear, you just testified the
20 wrestling program was not a PAL program; did I
21 misunderstand you?

22 A. The PAL was being ran by a coach that
23 was not part of PAL and they were advertising it and
24 getting funding for it as a PAL program.

1 Q. Was PAL funding the wrestling program?

2 A. Yes.

3 Q. Okay. And did you make a complaint to
4 anybody about the fact that the wrestling program
5 could travel but there couldn't be a travel
6 basketball program?

7 A. Yes, because of the officers had
8 submitted several memos that wanted to do travel
9 basketball and they kept getting turned down prior to
10 me getting there and when I sat down with Ted Qualli
11 to discuss it, his reasoning was that they were not
12 allowed to leave the state, and as I was there longer
13 I found that there was -- that the wrestling team was
14 allowed to leave the state just like the golfing team
15 that's also ran out of Rizzo.

16 Q. Did you make complaints about this to
17 other anybody other than Ted Qualli?

18 A. The Board, I told Sullivan, I told
19 the -- the important people on the police side as
20 well as PAL side.

21 Q. You say important people on the police
22 side, who did you tell?

23 A. My commanding officer which was
24 Sullivan.

1 Q. And how did Sullivan respond when you
2 made these complaints to him?

3 A. He didn't respond at all, he would
4 dismiss me. He kept me -- he let them do whatever
5 they wanted to do. He didn't want me to do anything.
6 He kept undermining my command by always siding with
7 the Board.

8 Q. You said he undermined your command, to
9 be fair he was your commanding officer, correct?

10 A. Yes.

11 Q. Okay. Were you ever disciplined for
12 making these complaints?

13 A. No.

14 Q. Okay.

15 A. I was retaliated against.

16 Q. Well, what do you mean by that?

17 A. I -- every time I complained Sullivan
18 was isolating me. He would take -- he would call my
19 sergeant who was my subordinate to his office and he
20 started planning and doing things through my
21 sergeant, Sergeant Faust, and whenever there was an
22 event or something that I was planning he would call
23 and tell me that other people would oversee those
24 events and those plans. And slowly but surely he was

1 cutting my responsibilities and isolating me more and
2 more.

3 Q. Who were other -- who were the other
4 people he would put in charge of those events?

5 A. When I was planning the Eagles event,
6 he assigned someone from police headquarters which
7 was not part of PAL to handle an event that I had
8 solidified with the Eagles team -- with the Eagles
9 team, and he told me that I would no longer oversee
10 that event and assigned someone from the third floor
11 to that event.

12 Q. What was the Eagles event?

13 A. The Eagles event was a Thanksgiving
14 dinners and Christmas dinners as well as toys that we
15 would give to the community. They would donate
16 everything, we would get together, put over a hundred
17 baskets together and we would go to the community and
18 give out these baskets and some of the Eagles players
19 would go out with us to surprise those families.

20 Q. And who did he assign to oversee that
21 event?

22 A. He just called me and said that I -- he
23 first called me and told me to give him as
24 explanation as to how I organized this event and once

1 he knew the details he told me that I would no longer
2 be in charge, that he was going to assign someone
3 from the third floor.

4 Q. You don't know who he assigned?

5 A. No.

6 Q. What year was that?

7 A. 2017, 20 -- when he first got to PAL he
8 started doing all of this. And basically he had me
9 taking orders from a subordinate sergeant because he
10 wouldn't speak to me. He would do everything through
11 my sergeant and instructed my sergeant to see him
12 behind my back.

13 Q. And that was Sergeant Faust?

14 A. Yes. This started causing a very
15 hostile work environment because he basically gave
16 the sergeant wings to be disrespectful and to
17 literally laugh at my face, you know, because the
18 sergeant had been facing disciplinary action and
19 Sullivan told me that I was not to take any action
20 against the sergeant, so he was protecting the
21 sergeant.

22 Q. What was the disciplinary action,
23 sorry?

24 MR. GREEN: I'm sorry, can you repeat

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1 that question, please.

2 MS. ULAK: I asked what the
3 disciplinary action was.

4 MR. GREEN: Okay, thank you.

5 THE WITNESS: The sergeant would
6 blatantly disobey my orders to carry out
7 anything and that's -- that's when I found
8 that he was going to see Sullivan because the
9 sergeant had told me, and when I asked him why
10 was he at Sullivan's office he said well, he
11 told me not to tell you that, you know, I was
12 going to go see him and then that became an
13 every week situation where the sergeant would
14 leave to go meet with Sullivan.

15 And then because Sullivan told me not
16 to take any actions against him he would
17 basically -- started, you know, just being
18 blatantly disrespectful, blatantly disobeying
19 my orders, making it harder for me to do my
20 job, but the sergeant was being disciplined
21 because he used to disappear and I would find
22 out that he'd be playing golf all day on City
23 time with Board members.

24 He had been there for so long that this

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1 is what he was doing. The sergeant was also
2 disgruntled because we used to get tickets
3 donated to us by the different teams which
4 we're supposed to be distributed to the kids
5 or the officers that work PAL, but these
6 tickets would disappear, hundreds of tickets
7 would disappear under the, you know, under the
8 sergeant's oversight.

9 So I reassigned that task to someone
10 else, Officer Younger to start overseeing and
11 making sure that the -- the gifts that we were
12 receiving were properly distributed and the
13 sergeant was upset about that.

14 Just a lot of things that the sergeant
15 was doing that was in violation of police
16 department policy. One of them being paying
17 the officers under the table for PAL events.

18 Along with Ted Qualli paying the
19 officers under the table for PAL-related
20 events as opposed for the officers to get paid
21 their rightful salary and go through police
22 finance.

23 BY MS. ULAK:

24 Q. I'm sorry, Ms. Cintron, I may not have

1 understood you, were you saying that Sergeant Faust
2 and Ted Qualli were both paying officers under the
3 table for PAL events?

4 A. Yes.

5 Q. How was Sergeant Faust paying people
6 for PAL events under the table?

7 A. He would coordinate for the officers to
8 show up at PAL events that were done during the
9 weekend. Officers work Monday through Friday, not
10 the weekends, so whenever they planned -- they had
11 several events that they planned throughout the year
12 for them to work on the weekend and instead of going
13 through police finance, they were paying the officers
14 \$25 under the table to go work these events.

15 Q. \$25 for the whole event, sorry?

16 A. \$25 as opposed to their rightful
17 salary, and I spoke to -- to Paterson about it as
18 well as Sullivan about it and explained that they
19 were going through finance, Sunny Li and Ted Qualli
20 told me that he had filed to go through finance but
21 the finance never got back to them, and when I spoke
22 to someone in finance finance told me that they
23 didn't have any record of PAL trying to do, you know,
24 like do -- I forget what it's called, to get

1 reimbursed, a reimbursement account and that they had
2 no record that PAL ever did that. And DC Paterson
3 called me and told me the same thing and he was upset
4 because they hadn't reimbursed the City for some
5 money that they owed the City and then they were
6 paying them to do certain events instead of going
7 through finance, paying the officer like that.

8 So I stopped that and I said hey, we
9 need to do this the correct way, we need to go
10 through finance and establish an account, and the
11 officers by contractual agreement are not allowed to
12 work in uniform on their days off because then it's
13 considered on duty, and they didn't understand that.
14 They were upset that I was changing the process of
15 how they pay these officers, so that was another
16 concern and Paterson --

17 Q. Can you just back up, can you repeat
18 what you were saying? You cut out again.

19 A. Paterson was really upset about how
20 they were doing this and he said that from now on,
21 unless it's going through police finance that he was
22 going to allow the officers to work these events.

23 Q. Did they start going through police
24 finance?

1 A. They never went through police finance.
2 So a year later -- when Sullivan was in place, they
3 wanted to do then but they still hadn't gone through
4 finance and that was like another issue we were
5 having. My job there was to make sure that people
6 were following policy and that the instructions I got
7 from Commissioner Ross was to straighten things out
8 over there because there was a lot of violation of
9 policies that he wanted me to correct, and my job was
10 to make sure that they were following policy, but I
11 had no idea that this was going on until I got there.

12 Q. You say following policy, whose policy?

13 A. Departmental policy.

14 Q. Okay. And who has to follow
15 departmental policy?

16 A. The officers.

17 Q. Okay.

18 A. And the sergeants.

19 Q. Thank you.

20 Do PAL employees have to follow
21 departmental policy?

22 A. They're not directly responsible to
23 follow departmental policy. But as I explained to
24 Ted and the Board, I cannot compel the officer to do

1 something that's in violation of departmental policy.

2 Q. I think you cut out again. Am I
3 understanding correctly that you were saying you
4 cannot compel an officer to do something in violation
5 of departmental policy?

6 A. Yes.

7 Q. And just to be clear, PAL is not
8 subject to police department policy?

9 A. No, they're civilian staff.

10 Q. Okay. And civilian staff are not
11 subject to departmental policy?

12 A. No. The only thing they're responsible
13 for and Ted and I spoke about it was to make sure
14 that whatever they were doing involving the officer
15 was within the scope of our policies.

16 Q. So you testified that Commissioner Ross
17 appointed you to be the commanding officer of PAL and
18 that you wanted -- he wanted you to straighten things
19 out. What did he mean by that?

20 A. He just made the comment that the
21 officers over there were doing -- were doing whatever
22 they wanted and that he needed me to go over there
23 and make sure they were following policy and
24 complying with, you know, departmental policy and

1 contractual agreements and that's what I did.

2 Q. You testified a few minutes ago about
3 concerns you had about Sergeant Faust, did you ever
4 report him to Internal Affairs?

5 A. I wrote him up several times. I gave
6 him counseling forms and I discussed it with Paterson
7 and Sullivan. Paterson would explain to him -- and
8 they called both sergeants to the office and told
9 them they better straighten out. Commissioner Ross
10 and Deputy Commissioner Paterson told them you guys
11 need to jump on board and stop acting like fools and,
12 you know, you all need to start complying, you know,
13 with the lieutenant. And I was about to write
14 Sergeant Faust up when Sullivan took over but I was
15 instructed to leave him alone.

16 Q. And who you instructed you to leave him
17 alone?

18 A. Deputy Commissioner Sullivan.

19 Q. Okay. And did you -- just so we're
20 clear, you never reported him to Internal Affairs,
21 correct?

22 A. No, I reported him to my commander and
23 I went to Sullivan to seek his advice and he told me
24 leave him alone, don't do nothing and leave him

1 alone. By then the sergeant had been visiting
2 Sullivan every week and would come back and laugh
3 about it and say oh, he's my buddy now loudly for me
4 to hear.

5 Q. When did Joe Sullivan take over PAL?

6 A. When he got promoted I was called
7 through Deputy Commissioner Paterson to his office
8 and he informed me that Deputy Commissioner Sullivan
9 wanted to have oversight over PAL, and he
10 expressed which is fine by me because it's less work
11 for me if he wants to do my job and take over that
12 unit. And I immediately told Paterson given the
13 conversations I had with Robert Rabena and Bernie
14 Prazencia about Sullivan, that it would be a conflict
15 of interest for Sullivan to oversee PAL and Paterson
16 reiterated, let's just see what happens. It's a load
17 off me and if he wants to overtake PAL -- oversee
18 PAL, then he can have it.

19 Q. When Deputy Commissioner -- when Joe
20 Sullivan was promoted to deputy commissioner, what
21 did he become the deputy commissioner of, do you
22 remember?

23 A. He was deputy commissioner of
24 operations. I believe it was -- of patrol. It might

1 have been patrol. To be honest with you, patrol
2 bureau -- it's all confusing now.

3 Q. That's okay.

4 A. He definitely was not in charge of PAL,
5 PAL wouldn't have fell under his jurisdiction.

6 Q. PAL would or would not have fallen
7 under his jurisdiction?

8 A. Would not have fallen under his
9 jurisdiction because I think he might have been
10 patrol. He was deputy commissioner of patrol
11 operations.

12 Q. Okay. What was Myron Paterson deputy
13 commissioner of?

14 A. He was deputy commissioner -- he was
15 second in command, I can't remember what he was in
16 charge of.

17 Q. When Joe Sullivan got promoted, did
18 Myron Paterson also get promoted?

19 A. No.

20 Q. Myron Paterson stayed in the same
21 position?

22 A. Yes.

23 Q. Did Joe Sullivan only work with PAL as
24 deputy commissioner?

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1 A. No.

2 Q. Do you know what else Joe Sullivan
3 oversaw?

4 A. He was deputy commissioner of patrol,
5 so he would have been in charge of all the districts
6 and, you know, anything pertaining to patrol
7 operations.

8 Q. For how long did you work for Joe
9 Sullivan?

10 A. I would say about a year.

11 Q. How was your working relationship with
12 Joe Sullivan?

13 A. We did not have a good working
14 relationship because immediately when he began to
15 oversee PAL he was meeting with the Board, and every
16 time I would go talk to him he would literally be so
17 dismissive about anything that I had to say that on
18 one occasion he's rolling his eyes back, he's making
19 all these like bothering gestures as opposed to
20 having some concern about the concerns I was bringing
21 to him.

22 And he started telling me let them do
23 whatever they want. He stopped the Memorandum of
24 Understanding that was supposed to be implemented

1 ordered by Ross and everything that they complained
2 about they got, even though, you know, it was not in
3 the best interest of the police department.

4 Q. What was the Memorandum of
5 Understanding supposed to accomplish?

6 A. When I first arrived at PAL, I was
7 there like a week or so, actually a couple of days,
8 they brought this to my attention almost immediately.
9 Sunny Li and Ted Qualli approached me with a policy
10 that they were trying to implement. The policy --
11 when I read the policy, I understood it to be that
12 everything would eventually lead up to Ted's
13 decision, final decision on everything.

14 Q. Hang on a second. Can you repeat that?

15 A. That Ted Qualli and Sunny Li brought to
16 my attention a policy that they said the Board wanted
17 implemented and they -- and basically when I read the
18 policy it basically would take the commanding officer
19 out of the equation, ultimately every decision would
20 filter back to Ted Qualli as a director for final
21 say.

22 So I was concerned about the policy and
23 the way that it read and I went to deputy -- I mean
24 to Commissioner Ross and Deputy Commissioner Paterson

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1 who called a meeting, they reviewed the policy and
2 they told me that I was right not to sign that policy
3 and Commissioner Ross had called in a meeting with
4 Robert Rabena, Bernie Prazencia, Ted Qualli, myself,
5 Deputy Commissioner Paterson and his legal advisor
6 Fran Healy. At this meeting they discussed the
7 policy, Commissioner Ross said that, you know, that
8 the way the policy read it was literally taking the
9 police department out of the equation allowing for
10 complete oversight by PAL and -- which was not
11 conducive to the police department.

12 At which time he told his legal advisor
13 to draft a Memorandum of Understanding because
14 apparently there was nothing ever in place explaining
15 what each party was supposed to be doing. During
16 that meeting they also went over my job as the
17 commanding officer and Ted Qualli's job as a director
18 and how we were supposed to be working together and
19 that this policy would literally take me out of the
20 equation.

21 So he ordered that Memorandum of
22 Understanding. It was being processed. It took a
23 long time. They were working with the City
24 Solicitor, I believe the person prior to you and --

1 to draft this Memorandum of Understanding.

2 The Memorandum of Understanding finally
3 came out around the same time that there was an issue
4 at PAL with civilian staff and a police officer.

5 When we went to Bernie Prazencia's office, Sullivan
6 and I, he wanted me to meet him at Ronald Rabena's
7 office -- I mean Bernie Prazencia's office 6 ABC, and
8 we went there Sullivan looked at Ron Rabena and
9 Bernie Prazencia and said don't worry about it, that
10 MOU is not going anywhere as, you know, he flagged
11 me. It was like, oh, don't worry about it it's not
12 going anywhere, he flagged me. And after that I
13 don't know what happened with the MOU because it was
14 never implemented.

15 Prior to that he told me to stay out of
16 it and when I called Fran Healy, before Sullivan told
17 me to stay out of it, Fran Healy explained to me that
18 he was taken off of it also because Sullivan said
19 that he will oversee it from that moment on and he
20 was instructed not to be bothered with it.

21 So when I called Sullivan, that's when
22 he told me forget about the MOU, you're no longer
23 involved in that and then the meeting took place that
24 I just explained. And I don't know whatever happened

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1 to the MOU and why Commissioner Ross' orders were
2 being ignored.

3 Q. You said that Joe Sullivan flagged you,
4 what do you mean by that, what is flagging?

5 A. It's a gesture, you know, like when you
6 take your hand and kind of like what she has to say
7 doesn't matter. He looked at me and said what she
8 has to say doesn't matter, and he also -- that same
9 day he said -- he also told Ron Rabena about the
10 transfer. He was like don't worry about it, that's
11 going to happen. He was being very dismissive and
12 rude to me at the meeting and just letting them know
13 the MOU is not going anywhere and who's this kid you
14 want at PAL, consider it done. You know, like he was
15 very dismissive of me at this meeting.

16 Q. Okay. Ms. Cintron, you've kind of said
17 a lot of things in the last few minutes of your
18 testimony so I'm going to have to kind of back up,
19 and I'm sorry because I think there's going to be a
20 lot of jumping around here.

21 Okay. You had testified that the
22 impetus for the MOU was that there was going to be
23 this policy that PAL had proposed, that they wanted
24 you to sign off on and it would give them complete

1 oversight of PAL and it was not conducive to the
2 police department. Did I get that correct?

3 A. Right, because the way that it was
4 structured, all the decisions, the final decisions
5 would line with Ted Qualli.

6 Q. And what decisions were those; what
7 types of decisions?

8 A. According to the policy it would have
9 been everything because every department would have
10 gone for his final say.

11 Q. Well, and I know that -- I understand
12 what you're saying but I need you to be specific, you
13 say everything, is that funding?

14 A. It was everything, programs.
15 Everything that we did at PAL would have been
16 filtered through his staff ultimately him being the
17 final decision maker. So in essence as the
18 commanding officer I had people subordinate staff to
19 me that I would have to go to to get permission to do
20 stuff.

21 Q. Okay.

22 A. Ted, at his level, could make the final
23 decisions. So even if I requested anything it would
24 have gone to Ted for final decisions.

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1 Q. You say a subordinate staff, do you
2 mean PAL civilian staff?

3 A. It would have been PAL civilian staff
4 who have a lesser authority within the structure that
5 I do, yes.

6 Q. Okay. But to be clear, PAL civilian
7 staff are not employed by the City of Philadelphia?

8 A. No.

9 Q. And they're not police officers,
10 correct?

11 A. No.

12 Q. But so --

13 A. What I'm trying to explain is that, I'm
14 in charge -- for instance, if I'm charge of the
15 programs team, why would I go downward to get
16 authority from someone to do something that I'm
17 trying to do who's reporting to me on that team even
18 though they're civilians they're working with me on
19 that programs team.

20 Q. Okay. The programs team you testified
21 though, they're not City of Philadelphia employees,
22 right?

23 A. There were some officers and some
24 civilians.

1 Q. Okay.

2 A. But if Ted and I are supposed to be in
3 charge of PAL, my question is why do I have to go to
4 one of his subordinate staff to get permission only
5 for Ted to have final authority anyway?

6 Q. Okay.

7 A. It should have been my decision and his
8 decision as final authority.

9 Q. Okay. And this is for things like
10 programming?

11 A. Everything PAL according to what they
12 told us we were supposed to be doing.

13 Q. Okay. Again, I ask for things like
14 programming, right?

15 A. Yes.

16 Q. Is that for things like how -- where to
17 allocate a budget?

18 A. We -- yes. Like budget, everything,
19 everything PAL.

20 Q. Is that for things like how to --
21 Ms. Cintron, I'm asking a question.

22 Is that for things like approving
23 capital improvements to a building?

24 A. It had to do with everything pertaining

1 to PAL, the finances, programming, what we're going
2 to do this year, what fundraisers we're going to do,
3 how we're going to do them.

4 Q. Is there any documentation or
5 literature that you received when you were appointed
6 commanding officer of PAL that laid out your job
7 description and duties as commanding officer?

8 A. No, but when they try to implement that
9 policy, that's what the MOU was supposed to do. It
10 was supposed to outline who had authority over what.

11 Q. Okay.

12 A. And it was discussed at the meeting
13 that Ted and I had equal authority, not him more than
14 me because he worked for the Board. We had equal
15 authority over all things PAL which Commissioner Ross
16 made very clear at the meeting and it was supposed to
17 be implemented in the Memorandum of Understanding.
18 They did not want the Memorandum of Understanding to
19 take place and they were really upset about it.

20 Q. You said Commissioner Ross at the
21 meeting, what meeting?

22 A. The meeting where he called Bernie
23 Prazencia, Ron Rabena, Ted Qualli, myself, his legal
24 advisor about the policy they were trying to

1 implement.

2 Q. When did that meeting take place?

3 A. 2017.

4 Q. And where did it take place?

5 A. Commissioner Ross' office.

6 Q. And were Ted Qualli, Ron Rabena and
7 Bernie Prazencia all physically present at that
8 meeting?

9 A. Yes.

10 Q. You testified about an issue at PAL
11 between civilian staff and a police officer, what was
12 the issue?

13 A. They began fighting over the use of a
14 computer -- a computer.

15 (Technical difficulties.)

16 BY MS. ULAK:

17 Q. I'm sorry, you have to repeat that.

18 A. They were arguing about the use of a
19 computer.

20 Q. Who is the police officer?

21 A. Officer Klayman and Chase Trimmer.

22 Q. When did that happen?

23 A. Also 2018.

24 MS. ULAK: At this point I like to

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1 request a five-minute comfort break if that's
2 possible.

3 MR. GREEN: I'm sorry.

4 MS. ULAK: I would like to request a
5 five-minute comfort break.

6 MR. GREEN: Oh, sure.

7 MS. ULAK: I think our court
8 reporter would like one.

9 MR. GREEN: Oh, absolutely.

10 THE VIDEOTAPE OPERATOR: The time is
11 11:39 a.m. We are off the record.

12 * * * * *

13 (Whereupon, a brief recess was taken.)

14 * * * * *

15 THE VIDEOTAPE OPERATOR: The time is
16 11:54 a.m. and we are back on the record.

17 BY MS. ULAK:

18 Q. Okay. Ms. Cintron, before we took a
19 break you had mentioned -- excuse me, I'm sorry.
20 Before we took a break you had mentioned an issue
21 that occurred between a police officer and a power
22 play over the use of a computer and you had testified
23 that it had happened in 2018. If I submitted to you
24 that this may have happened in 2017, would that seem

1 correct to you?

2 A. No.

3 Q. So what had happened in this incident,
4 do you recall?

5 A. I was in my office and I heard yelling
6 between Chase Trimmer and Officer Klayman and when
7 I -- we came out of the office, they were arguing and
8 I instructed both of them to stop, which they did and
9 basically they were arguing over the use of a
10 computer.

11 Q. You said we, were you with somebody?

12 A. Yes, I was in a meeting -- I was in a
13 meeting with Sergeant Faust and Cassandra Harris
14 about an upcoming event.

15 Q. You testified you were a meeting with
16 Sergeant Faust was that?

17 A. Yes. Sergeant Faust was in the office
18 and Cassandra Harris was in my office and we were
19 talking about an upcoming event. She was filling --
20 Cassandra Harris was filling us in about an event
21 that was taking place.

22 Q. You heard yelling and you went to see
23 what was happening?

24 A. Yeah, I came out of the office to find

1 out what was going on.

2 Q. And how did the fight resolve?

3 A. They argued. I told them be quiet,
4 they did, stop arguing. And they had like a few
5 final words and then I called -- I told the sergeant
6 to deal with the officer and pull him in to my
7 office. I called Ted Qualli to discuss the situation
8 with him because it was involving one of his staff, a
9 person that reported to him, and Ted Qualli was not
10 answering my phone calls.

11 And the next thing you know I'm getting
12 a call from the deputy because the Ted Qualli spoke
13 to him directly without discussing anything with me
14 and he ends up calling a meeting with his staff
15 telling them to go home because Officer Klayman
16 carries a gun and he basically prompted -- I wouldn't
17 say hysteria, but like people that were not even
18 there or were aware of the incident were -- they were
19 all sent home.

20 Q. Okay. Did that all happen on the day
21 of this incident?

22 A. Yes.

23 Q. Who is David Klayman?

24 A. He used to be my assistant.

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1 Q. Okay. And for whom did he work?

2 A. He was a police officer.

3 Q. And what was your relationship with
4 him?

5 A. He worked for me. He was my assistant.

6 Q. What did he do for you as your
7 assistant?

8 A. He would get crime data for me, run
9 errands for PAL, coordinate events if the --

10 (Technical difficulties.)

11 BY MS. ULAK:

12 Q. Hang on. Hang on. Hang on.

13 Can you repeat that?

14 A. The whole thing?

15 MS. ULAK: Let's go off the record for
16 a second.

17 THE VIDEOTAPE OPERATOR: The time is
18 11:58 a.m. We are off the record.

19 * * * * *

20 (Whereupon a discussion was held off
21 the video record only.)

22 * * * * *

23 MS. ULAK: Ms. Cintron, you're having
24 significant hearing issues. Is everybody else

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1 having issues with this?

2 MR. GOLDEN: I don't see the witness
3 right now. She's frozen.

4 MR. GREEN: Maybe if she dials in, that
5 might improve the overall signal from her end.

6 MS. ULAK: That might be a better
7 option.

8 * * * * *

9 (Whereupon, a brief recess was taken.)

10 * * * * *

11 THE VIDEOTAPE OPERATOR: The time is
12 12:07 p.m. and we are back on the record.

13 MS. ULAK: Ms. Schumann, do you mind
14 rereading my last question?

15 * * * * *

16 (Whereupon, the requested portion of
17 the testimony was read back by the court
18 reporter.)

19 * * * * *

20 THE WITNESS: He was the administrative
21 assistant. He primarily worked on the mapping
22 analysis, crime data, getting -- he ran some
23 PAL-related, you know, runs, picked stuff up,
24 he organized some of the -- helped some of the

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1 organized events, he was on the programs team
2 and things of that nature. He handled all the
3 paperwork that I had to turn in to the City,
4 like if we had any memos to do, if we had any
5 -- anything like that to do, overtime. He
6 managed overtime, making sure that it was on a
7 rotating basis.

8 BY MS. ULAK:

9 Q. You say he managed overtime making sure
10 it was on a rotating basis, was he the one that would
11 assign overtime to the officers?

12 A. No.

13 Q. Okay.

14 A. The sergeant would do that, but when I
15 got there it was not equally distributed, so his job
16 was to check the reports to make sure that we were on
17 a rotating basis and that everyone got equal amount
18 of overtime.

19 Q. Okay. When did he join PAL?

20 A. A few months after I arrived.

21 Q. Was somebody that he brought on or was
22 he brought into PAL by somebody else?

23 A. I spoke to -- Paterson told me I could
24 have an assistant and he told me to pick someone and

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1 because he was worked at the 25th District and did a
2 great job there I picked him as second choice because
3 my first choice couldn't come.

4 Q. Who was your first choice?

5 A. Mulholland, Officer Jimmy Mulholland
6 (ph.)

7 Q. And why couldn't he come?

8 A. Because his wife was a nurse at
9 St. Christopher's Hospital, which is in close
10 proximity to the 25th District, they had the same
11 hours and they would travel to work together and
12 leave together, so when he found out that PAL worked
13 evening hours or afternoon hours, he told me he
14 couldn't do it. He couldn't change his shift.

15 Q. Okay. And when Officer Klayman joined
16 that was when you were able to ensure that overtime
17 was being distributed on a rotating basis?

18 A. Yeah, I would give him assignments.
19 Since we have so many events and so many programs
20 going on and I had to visit centers and all of that,
21 he would monitor that stuff for me like an
22 administrative assistant would.

23 Q. Okay. What hours did he work for PAL?

24 A. It depends. PAL -- his hours were in

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1 the morning like eight to five or nine to five,
2 whatever it was, and -- but if I had to switch to
3 night work because we had events that he was
4 assisting with, he would work in the afternoons as
5 well. So it just depends like what was going on at
6 PAL.

7 Q. Okay. Was he able to work flexible
8 hours?

9 A. No, he wasn't able to work flexible
10 hours. He went by the schedule, primarily my
11 schedule which was all kinds of different times
12 because he was my assistant.

13 Q. Did he essentially work when you
14 worked?

15 A. Yes. And sometimes when I worked the
16 afternoon, he will work the morning because he had
17 stuff to do in the morning. So it just depends on
18 what was going on in the unit.

19 Q. Okay. After the incident with the
20 civilian, did he continue working at PAL?

21 A. No, Sullivan had him transferred.

22 Q. Where was he transferred to?

23 A. Neighborhood services.

24 Q. Okay. Did Sullivan request that you

1 transfer him out?

2 A. No, he just did it.

3 Q. Okay. To your knowledge, was he ever
4 disciplined for the incident with the civilian?

5 A. I'm not sure if he was disciplined or
6 not.

7 Q. To your knowledge, does he still work
8 for the police department?

9 A. To my knowledge, he graduated from
10 college and he left the job shortly thereafter.

11 Q. Earlier you had testified about
12 somebody having a desire to bring an officer into
13 PAL.

14 A. Yes.

15 Q. And I wanted to know if you could
16 elaborate on that again.

17 A. From the moment I met Ron Rabena, he
18 was asking me to do him a favor and have an
19 individual transferred into PAL. First he said it
20 was a relative, then he said it was a family friend,
21 so I don't know exactly what's the relationship there
22 because he said different things at different times
23 pertaining to what kind of relationship they had.

24 I told him that I would look into the

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1 transfer list to see if this individual was on the
2 list. He was not on the list, so I told him have him
3 submit his paperwork and when I looked into this
4 individual he had less than two years on the job. He
5 did not have the points necessary to transfer and he
6 did not have the experience nor was he doing anything
7 in the community to indicate that he was
8 community-oriented which is required being at PAL.

9 Q. Ms. Cintron, I'm sorry to interrupt you
10 but I just want to ask this question, what is this
11 individual's name?

12 A. It's in the paperwork that we submitted
13 for discovery, but I can't recall his name right now
14 to be honest with you.

15 Q. Okay. All right.

16 A. I know he was in the 17th -- I know he
17 was in the 17th District.

18 Q. All right. Continue.

19 A. So I explained to Ron Rabena that it
20 would be hard for me to transfer him in and it would
21 be unfair for me to transfer him in given that he did
22 not meet the criteria for transfer. Even though I
23 told him that he would still ask me every time I saw
24 him, come on lieutenant, do me that favor, have him

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1 transferred in and what have you, and I told him I
2 don't have the authority to transfer someone in
3 without properly -- without showing that they met the
4 criteria and that it was beyond -- you know, above my
5 level to do something like that.

6 At what which time I got a call from
7 Captain Francis which is -- which was at the time, I
8 don't know if she's still there, the captain of the
9 17th District and she said -- she mentioned Ron
10 Rabena, that Ron Rabena had called her, that this
11 officer worked for her and that he was a good kid and
12 she was recommending him, and I explained to her the
13 same thing I explained to Ron Rabena.

14 The next thing I know my officer from
15 the 17th District PAL called me and asked me why was
16 this kid working at the center -- assigned to the
17 center by Captain Francis which I didn't know that
18 this officer was working there.

19 So I spoke to the officer and I said
20 no, he was basically asking me did I approve for this
21 to happen and I said no, I had no idea that she was
22 assigned there. And when I called Captain Francis, I
23 explained to her that all the officers at PAL because
24 they're dealing with kids they have to go through a

1 background check and that this officer would not fall
2 under any PAL protection or -- because they're
3 working there and they're not supposed to even be
4 there, and I told her that she needed to reassign her
5 officer back -- back to her district. Basically she
6 was carrying the officer as being at work, but in
7 reality she was sending him to work at the PAL center
8 every day.

9 Q. You say Captain Francis, what's Captain
10 Francis' first name?

11 A. I don't know her first name. I know
12 her as Captain Francis.

13 Q. Okay. And to be clear, you don't
14 recall the name of the individual even though that
15 person was being placed in PAL centers to work,
16 correct?

17 A. Yeah, I can't recall now, you know,
18 it's been a while.

19 Q. Okay.

20 (REQUEST)

21 MS. ULAK: I'm just going to make a
22 request on the record that somebody provide me
23 with the name of that individual. I don't see
24 it in my file, but I know that this matter had

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1 been transferred to me, so, you know, it's
2 very possible it was sent earlier and I just
3 don't have it. So I would just kind of
4 request that Ike's office resend it to me,
5 okay?

6 MR. GREEN: I don't have it -- I mean I
7 don't have it.

8 MS. ULAK: Okay then. All right.

9 THE WITNESS: So after I spoke to
10 Captain Francis, I get a call from Council
11 President Daryl Clark who also mentioned Ron
12 Rabena, that Ron Rabena had given him a call
13 and asked him to call me about this
14 individual, and I explained to him the same
15 thing that I explained to Rabena, as well as
16 Captain Francis and he said to me you need to
17 transfer this kid or I'm going to start making
18 some calls about you starting with
19 Commissioner Ross and he was pretty much --
20 the way I took it was a threat that I was
21 going to be blackballed, you know, or whatever
22 if I didn't do this favor.

23 And at that point I told him, well,
24 Commissioner Ross would be in the position to

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1 transfer this individual if he wanted to, so
2 that's what you're going to have to do because
3 I don't have the authority to do that. And he
4 called -- I think later on when I saw
5 Commissioner Ross at an event he mentioned
6 that Lieutenant Clark had called him, but he's
7 like I don't want to hear that nonsense, you
8 know, if he don't qualify to go over there
9 he's not going.

10 And when Sullivan -- later on I spoke
11 to Sullivan about it and Sullivan didn't say
12 nothing when me and him spoke about it until
13 we went to a meeting and we were supposed to
14 discuss the MOU and that I mentioned earlier,
15 the same meeting that I mentioned earlier and
16 at that time he told Ron Rabena in my presence
17 about that transfer, that kid you want, we
18 need new kids in the unit. He said consider
19 it done.

20 And that's when he was becoming really
21 disrespectful and, you know, doing all these
22 gestures with his hand as to disregard what I
23 had to say.

24 BY MS. ULAK:

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1 Q. Okay. I want to unpack this a little
2 bit more.

3 Before Joe Sullivan became deputy
4 commissioner and took over PAL, were you getting
5 pressure to bring this individual, whose name you
6 can't remember, into PAL?

7 A. Yes.

8 Q. Okay. Did that start pretty early into
9 your tenure as commanding officer at PAL?

10 A. Yes. However, Sullivan had -- once he
11 came in he informed the PAL -- the PAL, I mean,
12 Bernie Prazencia and Ron Rabena that he would make it
13 happen. He abused his authority and said he would
14 make it happen regardless of the decision I had made.

15 Q. Okay. And just to be clear there was
16 no question pending, but what I'm going to ask you
17 now is, for approximately two years while you were
18 commanding officer of PAL, you reported to Deputy
19 Commissioner Paterson; is that correct?

20 A. Yes.

21 Q. Okay. And it was during this time that
22 you were getting pressure to move this individual
23 into PAL?

24 A. During the time -- it started with

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1 Paterson. I can't pinpoint the date, but it started
2 when I was working -- when Paterson oversaw PAL. I
3 wouldn't say it was two years, like I can't pinpoint
4 the date, but it started when I reported to Paterson.

5 Q. Okay. And then when Sullivan took
6 over --

7 A. And I don't mean to cut you off, but
8 when I explained to Paterson what was going on, he
9 said if he doesn't qualify to come to PAL then
10 they -- they better not call me about it, you know.

11 Q. Yes. And if I'm understanding your
12 previously testimony correctly after you Council
13 President Clark called you, Commissioner Ross also
14 agreed with the fact that he did not qualify and to
15 not be transferred in; is that correct?

16 A. They didn't agree -- well, I won't
17 say -- what I'm trying to explain is that he didn't
18 qualify which is why I couldn't make -- put in
19 paperwork to have him transferred in because it would
20 have been declined from the upper ranks. When I
21 spoke to Paterson who informed Ross, they told me
22 that if the kid didn't qualify then not to worry
23 about it because I wasn't doing anything wrong.

24 It wasn't until Sullivan got into

1 office -- became oversight over PAL that he said
2 basically it doesn't matter what the lieutenant has
3 to say, we need new people at PAL and don't worry
4 about it, consider it done. He told Ron Rabena.

5 Q. And did that individual get moved into
6 PAL?

7 A. From my understanding, yes, after
8 enough -- or when I went out on leave.

9 Q. Okay. So that was over a year later;
10 is that right?

11 A. I don't know the dates, so I don't know
12 the date that he got transferred in.

13 Q. Okay. Let me ask it this way, you
14 worked for Joe Sullivan for approximately a year,
15 right?

16 A. Uh-huh.

17 Q. Yes?

18 A. Yes.

19 Q. And after you went out on leave, this
20 individual transferred into PAL, right?

21 A. Some time between the time that I went
22 on leave and had to leave the job, yes.

23 Q. Is that between when you went out on
24 leave and when you retired?

1 A. Yes.

2 Q. And so that would have been over a year
3 after Joe Sullivan took over as the deputy
4 commissioner overseeing PAL, am I understanding that
5 correctly?

6 A. The meeting took place as soon as he
7 went to PAL.

8 Q. Okay. So --

9 A. I don't know -- I can't speak for when
10 the kid was transferred because I don't know the
11 date.

12 Q. Well, I'm not asking you for the date.
13 I'm asking you if it would have been over a year
14 between that first meeting taking place and when this
15 individual was transferred into PAL?

16 A. That's what I'm saying, I was out for
17 almost a year, so I don't know where in that process
18 did he transfer in. It could have been a year, it
19 could have been six months after I went on leave, I
20 don't know.

21 Q. Did you go on leave a year after Joe
22 Sullivan took over PAL?

23 A. Maybe approximately, yeah.

24 Q. So, again, would you agree with me that

1 it had to have been at least a year between that
2 first meeting in which you testified that Joe
3 Sullivan said that this individual would be
4 transferred into PAL and when that individual was
5 actually transferred into PAL, it would have been at
6 least a year, right?

7 MR. GREEN: Objection. She's trying to
8 avoid guessing.

9 MS. ULAK: I would prefer -- I would
10 prefer you not offer a speaking objection.

11 You can answer the question.

12 MR. GREEN: If you know.

13 THE WITNESS: I don't know when he got
14 transferred in, so I would say maybe a year,
15 yes, I don't know.

16 BY MS. ULAK:

17 Q. Okay, fine. After that first meeting
18 where Joe Sullivan said that that individual would
19 get transferred into PAL, did you ever discuss it
20 with Joe Sullivan?

21 A. I had discussed it previous -- previous
22 to that meeting with him so he knew why I couldn't
23 put the paperwork in to have him transferred.

24 Q. After that meeting did you discuss it

1 again?

2 A. No, because he made it very clear that
3 that was his decision.

4 Q. Okay. In your discussion with him
5 before the meeting when you said this is why I can't
6 transfer him in, did he have anything to say in
7 response to that?

8 A. No.

9 Q. Were you disciplined at all for not
10 transferring this individual in?

11 A. No.

12 Q. While you were the commanding officer
13 of PAL, did you have a City issued cell phone?

14 A. Yes.

15 Q. Were there ever any issues with your
16 connectivity with the City issued cell phone?

17 A. Yes.

18 Q. Can you tell us a little bit about
19 those issues?

20 A. The phone would not work and I had a
21 switch it twice. Like there was an issue with the
22 line, I don't know what was going on, but I had to
23 turn in the phone because it was not working
24 properly.

1 I took it once before Sullivan to get
2 fixed, they gave it back to me and when Sullivan took
3 over it was still not working properly so I had to
4 get a new one.

5 Q. Okay. Did you have any issues getting
6 it replaced?

7 A. No, once I took it the second time they
8 replaced it.

9 Q. If your City issued phone wasn't
10 working, how were people going to be able to reach
11 you?

12 MR. GREEN: Can you repeat that?

13 MS. ULAK: I'm sorry, I don't think I
14 asked very well.

15 BY MS. ULAK:

16 Q. If your City issued cell phone was not
17 working, was there another way for people to reach
18 you?

19 A. No.

20 Q. Did you have a personal cell phone?

21 A. I have a personal cell phone but I
22 would leave that at home because I had the City phone
23 while I was at work.

24 Q. Okay.

1 A. Or I would leave it in the office to
2 avoid carrying two phones.

3 Q. For how long was your City issued phone
4 not working?

5 A. It would get like -- like freeze up on
6 me, so sometimes it would work, sometimes it wouldn't
7 work which is why I took it the first time to get
8 fixed, then they gave it back to me and it was still
9 doing the same thing so I took it back to get it
10 replaced.

11 Q. I'm going to pull up a document, just
12 give me a one second here.

13 We'll mark this as City-1. Hang on a
14 second.

15 What is happening here? I'm sorry, I
16 apologize.

17 All right. Ms. Cintron, are you able
18 to see my screen?

19 A. Uh-huh.

20 Q. Yes?

21 A. Yes.

22 Q. Great. So we're going to mark this
23 document as City-1, I will submit to you that this
24 document is four pages, it is Bates marked Sullivan

1 239 through Sullivan 242.

2 I just want to pull your attention to
3 the first page in this document marked Sullivan 239,
4 and I'm just going to give you a minute to read this
5 e-mail.

6 A. Okay. (Witness complies.)

7 Q. And you can tell me you're done reading
8 it.

9 A. Okay.

10 Q. Okay. So having looked at this e-mail
11 would you agree that this is an e-mail from Joe
12 Sullivan to you?

13 A. Yes.

14 Q. And looking at this e-mail in the
15 second paragraph it states you responded that your
16 City phone has been inoperable for some time and you
17 used your private phone while working.

18 Did I read that correctly?

19 A. Yes.

20 Q. Okay. So would you use your private
21 cell phone while you were working if your City phone
22 was not working?

23 A. My -- my cell -- when the phone was
24 acting up I had no choice to use my private phone to

1 make police-related phone calls.

2 Q. Okay.

3 A. But I never knew when the phone was
4 going to freeze up on me so sometimes I didn't have
5 it on me because I usually keep it in the office.

6 Q. Okay.

7 A. But if it was available I would use it.

8 Q. Okay. I'm just going to scroll through
9 this, I might be done with this.

10 You know, that's all I have on this.
11 Thank you for clarifying your testimony on this.

12 A. Okay.

13 Q. I'm going to stop sharing my screen.

14 Now, Ms. Cintron, I'm actually going to
15 pull up a document that we looked at your first half
16 of your deposition. This was previously marked as
17 PAL-4.

18 A. Okay.

19 Q. I'm just getting it handy.

20 Ms. Cintron, do you recognize this
21 document?

22 A. Uh-huh.

23 Q. Yes?

24 A. Yes.

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1 Q. Okay. And you see at the bottom --

2 A. I have to read -- I have to read it
3 though.

4 Q. Yeah, of course. I'm sorry, you tell
5 me if you need me to scroll, okay.

6 A. Okay.

7 Q. I'm going to keep scrolling so you get
8 to see --

9 A. Wait a minute, go back up a little bit.
10 Can you go up a little bit?

11 Q. Yeah, sure.

12 A. Right there.

13 Q. Okay.

14 A. Okay. This is the letter that somebody
15 sent that you showed me the first time?

16 MR. GREEN: Sharon, can -- Sharon, can
17 you go back to the first -- the very first --
18 the beginning of this particular -- okay. I
19 see it now.

20 MS. ULAK: Again, this was marked as
21 PAL-4 at the October 28th deposition.

22 MR. GREEN: Okay, right, okay.

23 THE WITNESS: This looks like the
24 letter that they showed me when I went to

1 the -- to the last deposition.

2 BY MS. ULAK:

3 Q. And prior to going to your last
4 deposition, had you ever seen this letter before?

5 A. Yes, they showed it to me at Internal
6 Affairs.

7 Q. Okay. Do you know who wrote this
8 letter?

9 A. Nope. No, I'm sorry.

10 Q. Okay. Do you have any speculation as
11 to who wrote this letter?

12 A. No.

13 MR. GREEN: Objection.

14 THE WITNESS: No.

15 BY MS. ULAK:

16 Q. Okay. I'll take this letter down.

17 I'm now going to turn your attention to
18 what was previously marked at your deposition as
19 PAL-2.

20 MR. GREEN: PAL-2?

21 MS. ULAK: Yes, it's the amended
22 complaint.

23 MR. GREEN: Okay.

24 BY MS. ULAK:

1 Q. Ms. Cintron, can you see my screen
2 here?

3 A. Yes.

4 Q. Okay. So this is the amended
5 complaint. It was marked as PAL-2, we looked at it
6 at your previous deposition, I am going to bring you
7 down to paragraph 54 of this complaint, so you're
8 going to see me scroll kind of quickly. And I just
9 want you to take a moment -- I'll take a moment and
10 highlight on here that you read paragraph 54.

11 A. Uh-huh. Do you want me to read it?

12 Q. No. No, I want to give you the chance
13 to read it and then you tell me when you're done.

14 A. (Witness complies.) Okay.

15 Q. Okay. So looking at this paragraph it
16 says as she reviewed the anonymous letter, plaintiff
17 immediately recognized the letter contained subject
18 matter which was actually provided to her -- by her
19 to Sullivan exclusively.

20 Are you able to explain what that means
21 in your complaint that you filed?

22 A. When I looked at the letter I
23 immediately noticed that there was the officers and
24 the persons mentioned in that letter were the

1 disgruntled officers that I was dealing with and I
2 had shared all of this information with Sullivan and
3 ironically they're the same people that are in this
4 letter after Sullivan called Sergeant Faust to his
5 office.

6 Q. Okay. So when you testified -- and I
7 just want to be clear, you testified you do not know
8 who wrote that letter?

9 A. Nope.

10 Q. Okay. And you don't have an idea of
11 who might have written the letter, right?

12 A. Nope. I just noticed it was
13 disgruntled officers mentioned in that letter that I
14 had mentioned to Sullivan.

15 Q. Okay.

16 A. Including the sergeant that I wanted to
17 write-up for what we discussed previously that he
18 told me to leave alone.

19 Q. Okay. I'm going to pull this down and
20 we're going to pull up PAL-4 again. Okay, so I'm
21 going to bring your attention back to PAL-4 and what
22 I'm going to ask you to do is tell me what in PAL-4
23 is information that you provided exclusively to Joe
24 Sullivan?

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1 A. The message to Officer Little is
2 that -- what's in there, in this letter is
3 inaccurate, but I did mention to him, to Sullivan
4 that I had to have the sergeant speak to Officer
5 Little because it was an ongoing investigation and
6 according to policy they're not supposed to be
7 discussing an investigation.

8 But what's in the letter is inaccurate
9 because I didn't say a lot of the stuff that's -- I
10 didn't say what's in this letter.

11 Q. Okay.

12 A. So it seems to me that Officer Little
13 because she had been reprimanded previously and was
14 upset about it, made it up -- made up some lies in
15 this letter, if it was her, I don't know.

16 Q. Okay. Saying if it was her do you
17 think it could have been Officer Little who wrote
18 this letter?

19 A. I don't know if it was her, but I
20 noticed that she -- that what she's saying in the
21 letter or whoever wrote this letter obviously knew
22 that Little was a disgruntled employee.

23 Q. Okay.

24 A. Which I had mentioned to Sullivan.

1 Q. Okay.

2 A. And only to Sullivan.

3 Q. I also see a mention of Sergeant
4 Pascucci in this letter. Had you ever discussed
5 Sergeant Pascucci with Joe Sullivan?

6 A. Yes, I had told Sullivan that I had
7 sent Sergeant Pascucci to inform Officer Little that
8 she needed to refrain from talking about an ongoing
9 investigation, but the letter seems like it was
10 something totally different.

11 Q. Okay. What was the ongoing
12 investigation?

13 A. I thought it was because of the --
14 originally I thought it was because of the argument
15 between the civilian and the officer, but then I got
16 a subpoena saying that I was the target of an
17 investigation.

18 Q. Well, I'm asking you what was the
19 ongoing investigation that you had Sergeant Pascucci
20 talk to Officer Little about?

21 A. Like I said originally I thought it was
22 the investigation that we started that we reported to
23 Internal Affairs about officer -- the officer and the
24 civilian having an argument, but later on I received

1 a subpoena that I was the target, so that's what I
2 was referencing to, not about the investigation
3 between the civilian and Officer Klayman because
4 Officer Little -- it was brought to my attention by
5 several officers that Officer Little was going around
6 talking about this investigation to the rest of the
7 officers.

8 Q. And what was she saying about the
9 investigation?

10 A. She was trying to get them involved in
11 the investigation by telling them to say things that
12 weren't true and they told her like don't get us into
13 that because that has nothing to do with us, and
14 that's why I told the sergeant tell her that this is
15 an ongoing investigation, that she can't be
16 encouraging people to tell lies or whatever, but I
17 didn't tell him to tell her all of that. I just told
18 him to tell her that this is an ongoing
19 investigation, that she needs to refrain from talking
20 about an ongoing investigation.

21 Q. Okay.

22 A. And that's according to policy, so I
23 didn't tell her anything that I wasn't in my right as
24 a commanding officer to tell her.

1 Q. Okay. And I want to be clear, you
2 don't know who wrote this letter?

3 A. Nope.

4 Q. And you don't have a suspicion as to
5 who wrote the letter?

6 A. Like I said, because of the names on
7 the letter and the complaint, I'm imaging it was
8 disgruntled employees and since one of them was
9 Sergeant Faust communicating with Sullivan, I don't
10 know where this came from.

11 Q. Is Sergeant Faust mentioned anywhere in
12 this letter?

13 A. I don't -- I got to read a little bit
14 more.

15 Q. Okay. I'll give you a minute to
16 continue reading it.

17 MR. GREEN: Can you scroll it from the
18 beginning?

19 MS. ULAK: Okay, I'll start at the
20 beginning.

21 BY MS. ULAK:

22 Q. And, Ms. Cintron, you tell me when you
23 want me to scroll down, okay?

24 A. You can scroll down.

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1 Q. Okay.

2 A. No, I don't see Sergeant Faust but I
3 know that Sergeant Faust had met with Officer Little.

4 Q. Okay.

5 A. And I also caught Sergeant Faust
6 talking with Keith Falco and mentioned to him -- was
7 talking about his meeting with Sullivan and how --
8 and how they were going to get me out of there.

9 Q. You saw Sergeant Faust --

10 A. Sergeant Faust was talking secretively
11 with Keith Falco and Ragucci, Officer Ragucci at
12 Rizzo PAL when I went over there because there was an
13 event that I wanted to attend and I walked through
14 the doors, I overheard them talking in the side
15 office saying the deputy, which is what caught my
16 attention, and Sergeant Faust was laughing and
17 bragging about how they were working on getting rid
18 of me. And when they saw me, they were surprised to
19 see me and tried -- and pretended to be talking about
20 something else.

21 Q. Okay. I just want to be clear about
22 one thing, the stamp -- there's a date stamp
23 on what's been marked as PAL-4, right?

24 A. Uh-huh.

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1 Q. Yes?

2 A. Yes.

3 Q. What's the date on there?

4 A. October 27, 2017.

5 Q. Okay. And I just want to be clear, at
6 the beginning it says October 13, 2017 and -- and
7 does this refresh your memory at all as to when the
8 incident between Officer Klayman and Chase Trimmer
9 occurred, did it occur in 2017 or 2018?

10 A. It was 2017.

11 Q. Okay. Thank you. I'm going to --

12 A. This letter surfaced a few weeks after
13 the incident.

14 Q. Okay.

15 A. Or a week or two as I recall.

16 Q. Okay. I'm going to take this down
17 then.

18 So you had testified that you heard
19 Sergeant Faust speaking with Officers Ragucci and
20 Falco about having you removed from PAL. When did
21 you overhear that conversation?

22 A. Shortly after Sergeant Faust started
23 visiting Sullivan on a weekly basis.

24 Q. When did Sergeant Faust start visiting

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1 Sullivan on a weekly basis?

2 A. Yes, and when I spoke to him about
3 jumping the chain of command, Sergeant Faust
4 explained to me that Sullivan told him not to tell me
5 that he was going up there, one. And two, that he
6 told him to disregard me, you know, and go -- and,
7 you know, he kept calling him to go up there.

8 So in an essence, he was creating this
9 hostile work environment for me because the sergeant
10 became very cocky and very condescending and
11 disrespectful and he would blatantly violate the
12 rules and he would brag about how Sullivan was his
13 buddy and -- and things like that, so it was making
14 it very hard for me to do my job.

15 Q. Okay. When did Sergeant Faust start
16 going to these weekly meetings with Deputy Sullivan?

17 A. After the incident between the civilian
18 and the officer.

19 Q. So that started in October of 2017?

20 A. Yes.

21 Q. Okay. How many weekly meetings could
22 have taken place?

23 A. I don't know. He -- he -- there was a
24 few times when the sergeant -- the first time he

1 didn't tell me. The second time -- you know, the
2 subsequent times he would tell me the deputy wants me
3 to come to his office and he would just leave.
4 Sullivan wouldn't contact me to see if the sergeant
5 was on another assignment, he won't contact me to let
6 me know. He was just calling the sergeant to come
7 see him.

8 Q. Okay. And am I understanding your
9 testimony correctly that Sergeant Faust would tell
10 you that he was visiting Deputy Sullivan and that
11 Deputy Sullivan told him not to tell you what he was
12 doing?

13 A. No, the first time when he was seen at
14 the roundhouse at Deputy Sullivan's office and I
15 found out about it and I approached him and asked him
16 why is he jumping the chain of command, he said the
17 deputy called me to his office but he told me not to
18 tell you. After that he would just say I have to go
19 to the deputy's office and he would leave.

20 Q. Okay. But -- okay. But he would tell
21 you he was going to Deputy Sullivan's office?

22 A. After the first time.

23 Q. Okay.

24 A. And I kept telling him he needed to

1 stop jumping the chain of command. He would not
2 listen and since Sullivan is my superior he would
3 have to follow the deputy's orders.

4 Q. So he's following the deputy's orders,
5 he's not really jumping the chain of command, is he?

6 A. The first time --

7 MR. GREEN: Before you answer that
8 question, can you repeat it, please?

9 MS. ULAK: Ms. Schumann, can you repeat
10 it?

11 * * * * *

12 (Whereupon, the requested portion of
13 the testimony was read back by the court
14 reporter.)

15 * * * * *

16 BY MS. ULAK:

17 Q. Ms. Cintron, you can answer.

18 A. Okay. The first time he -- the problem
19 wasn't per se jumping the chain of command. The
20 subsequent times, even though he did it the first
21 time, because the deputy was calling him to come to
22 his office, he would have to go see the deputy.

23 The problem here was that the sergeant
24 came back and was following the deputy's orders that

1 would cause me the inability to do my job properly
2 because, in essence, the sergeant who was my
3 subordinate staff, was telling me the deputy wants
4 this, the deputy wants that because the deputy at
5 some point wouldn't even talk to me. So I felt that
6 they were undermining my command by having a sergeant
7 tell me what to do.

8 Q. Okay.

9 A. And making my job more difficult with
10 this disgruntled employee who was coming back with,
11 you know, the ability to do whatever he wanted
12 because he was being protected by Sullivan who told
13 him not to -- not to do any -- take any disciplinary
14 action against him.

15 Q. Now, Ms. Cintron, you had testified
16 that you heard Sergeant Faust and Officer Ragucci and
17 Officer Falco talking about how the deputy was trying
18 to get rid of you and get you out of PAL and you
19 heard them -- your testified you heard them talking
20 at Rizzo PAL, when did this conversation take place?

21 A. All of this, as far as the sergeant
22 going up, it happened after the incident with the --
23 the officer and civilian staff --

24 Q. Okay.

1 A. -- member.

2 Q. You testified you were arriving at
3 Rizzo PAL for an event?

4 A. Yeah, they were having a mentorship
5 program upstairs and Officer -- the officer that was
6 working there had invited me to come up to the event.
7 So I was going up there to talk to the kids which is
8 the building next to the headquarters.

9 Q. Okay. And so when you entered the
10 building where were these three people?

11 A. When you enter Rizzo PAL immediately to
12 your right there's what used to be like a little
13 kitchenette.

14 Q. Okay.

15 A. And they were working over there trying
16 do some repairs -- not repairs, but they were
17 remodeling over there.

18 Q. Okay.

19 A. That's where Officer Ragucci was
20 assigned to because he was our procurement officer.
21 The procurement was over there. Officer Ragucci and
22 Falco are known to be friends with Sergeant Faust and
23 when I walked in, immediately to your right is where
24 they were at, but as you walk in you don't see who's

1 there because it's like a doorway. So when I walked
2 in they were laughing and giggling and saying these
3 things, so immediately like I -- when I heard them
4 mention my name, obviously, you know, I was within
5 hearing distance and I heard them say what I told you
6 they said about oh, we're going to get rid of her and
7 they were laughing and just carrying on but about
8 how, you know, they were going to get rid of me. And
9 then when they saw me they were in shock that it was
10 me and they tried to act like they were talking about
11 something else, but I already had heard what I had
12 heard.

13 Q. So this is a conversation they were
14 having openly at PAL, but they just didn't think you
15 were nearby?

16 A. Right, because I'm assigned to the
17 other building and there's nobody else in that
18 building.

19 Q. Okay.

20 A. Upstairs, Rizzo PAL is upstairs.

21 Q. Okay. Let's go back to this --

22 MS. ULAK: Actually, why don't we go
23 off the record for a second.

24 MR. GREEN: I'm sorry?

1 MS. ULAK: Let's go off the record for
2 a second.

3 MR. GREEN: Okay.

4 THE VIDEOTAPE OPERATOR: The time is
5 12:56 p.m. and we are off the record.

6 * * * * *

7 (Whereupon, a luncheon recess was
8 taken.)

9 * * * * *

10 THE VIDEOTAPE OPERATOR: The time is
11 2:11 p.m. and we are back on the record.

12 BY MS. ULAK:

13 Q. Okay. Ms. Cintron, welcome back.

14 A. Okay.

15 Q. All right. So I want to talk to you a
16 little bit more about what happened after that
17 anonymous letter was sent to the police department,
18 and you testified you don't know who wrote that
19 letter. How did you come to learn about the letter?

20 A. At Internal Affairs.

21 (Technical difficulties.)

22 MS. ULAK: Okay, we have to go off the
23 record again.

24 THE VIDEOTAPE OPERATOR: The time is

1 2:12 p.m. and we're off the record.

2 * * * * *

3 (Whereupon, an off the record
4 discussion was held.)

5 * * * * *

6 THE VIDEOTAPE OPERATOR: The time is
7 2:13 a.m. and we're back on the record.

8 BY MS. ULAK:

9 Q. Okay. So you came to learn of the
10 letter at Internal Affairs?

11 A. Yes.

12 Q. Okay. And you say -- what happened,
13 how did this all come to your attention?

14 A. I received the subpoena to report to
15 Internal Affairs, it stated that I was a target and I
16 thought I was going down there to be interviewed
17 about the incident that took place and they presented
18 me with the letter.

19 Q. Okay. When did you receive a letter
20 saying you were the target?

21 A. It's a subpoena that I received, I
22 don't remember the exact date on it.

23 Q. Did you receive it before you went down
24 to Internal Affairs?

1 A. Yes.

2 Q. Okay. And when you said you thought it
3 was about the incident that took place, we can agree
4 it was the incident between Officer Klayman and Chase
5 Trimmer, correct?

6 A. Yes.

7 Q. And what happened when you got down to
8 Internal Affairs and you saw the letter, what
9 happened next?

10 A. I just gave my interview. They took an
11 interview and that was it, but -- about they
12 questioned me about the letter, they questioned me
13 about the incident. I just gave my Internal Affairs
14 interview.

15 Q. To whom did you give the interview?

16 A. With detective -- what's his name? I'm
17 at a loss for his name now. I forget the name of the
18 investigator.

19 Q. If I told you it was Fred Conway, would
20 that -- does that sound correct to you?

21 A. Conway, yes, it was Conway.

22 Q. And did you have an attorney present at
23 this interview?

24 A. Yes.

1 Q. Who was that attorney?

2 A. It was an attorney for the City. She
3 was representing the officers there at Internal
4 Affairs.

5 Q. She was representing the officers at
6 Internal Affairs?

7 A. Yes.

8 Q. What was that attorney's name?

9 A. It was a female, I can't recall her
10 name. She represented me that one time.

11 Q. Represented you that one time?

12 A. She's the FOP attorney that represents
13 the officers.

14 Q. Okay. So an FOP attorney came, that
15 FOP attorney represents the officers, was she there
16 for you?

17 A. Yeah.

18 Q. Okay. So it was an attorney who was
19 representing you at this meeting?

20 A. Right.

21 Q. Okay. So you gave your Internal
22 Affairs interview in the presence of counsel on your
23 behalf; is that correct?

24 A. Yes.

1 Q. Okay. And what did you discuss in this
2 interview?

3 A. They questioned me about a lot of stuff
4 pertaining to the incident. They questioned me about
5 the validity of this letter. I can't say for sure
6 what specific questions they asked, but they just
7 asked me about the situation that happened.

8 Q. And during this interview, did you have
9 the opportunity to discuss any concerns that you
10 might have?

11 MR. GREEN: I'm sorry, I can't hear.

12 Can you repeat that question.

13 BY MS. ULAK:

14 Q. During this interview did you have the
15 opportunity to discuss concerns that you might have?

16 MR. GREEN: You may answer that.

17 MS. ULAK: I'm sorry, please go ahead,
18 Ms. Cintron.

19 THE WITNESS: Oh, I thought Mr. Green
20 was saying something.

21 MR. GREEN: I said you may answer, go
22 ahead and answer the question.

23 THE WITNESS: I don't have the document
24 in front of me, so I don't know what specific

1 questions you're referring to. I did explain
2 that, you know, I was the one that reported
3 the incident with the two to Sullivan and I
4 don't know how the investigation turned on me.

5 BY MS. ULAK:

6 Q. Okay.

7 A. After reporting it to Sullivan, but I
8 don't remember my exact words, but I do remember
9 explaining that I was going through all this stuff at
10 PAL.

11 Q. Uh-huh, yes. What was the stuff that
12 you were explaining that you were going through at
13 PAL?

14 A. How I was being treated, how they were
15 retaliating against me for speaking up about -- for
16 advocating for the centers and the kids and making
17 decisions that they were not happy with, and I
18 explained to them that the MOU had just been -- it
19 had just been announced that the MOU was finalized
20 and that we were going to be discussing that soon and
21 that all of a sudden everything that I reported to
22 Sullivan was now being turned against me from what I
23 could see.

24 Q. Okay.

1 A. From what I was experiencing.

2 Q. And who is it that you say was
3 retaliating against you, was that PAL employees?

4 A. No, I told them it was PAL, as well as
5 Sullivan.

6 Q. Okay. Ms. Cintron, I am going to pull
7 up what we will mark as City-2. Just give me one
8 moment here.

9 A. Uh-huh.

10 Q. Okay. Can you see my screen?

11 A. Yeah.

12 Q. Okay. You see at the top it says
13 statement of Lieutenant Evelyn Cintron?

14 A. Yes.

15 Q. Okay. It also says in the presence of
16 Danielle Nitti, Esquire. Is that the attorney for
17 the Union who was with you?

18 A. Yes.

19 Q. Okay. I'm going to represent to you
20 that this is the interview, I think it's actually all
21 of the interviews that you gave to Internal Affairs
22 in the presence of Brent Conway, and I'm just going
23 to kind of scroll you through this slowly, but do you
24 have any reason to dispute this is your interview?

1 A. No.

2 Q. Okay.

3 A. I haven't seen the whole thing but I
4 see my signature.

5 Q. Okay. So at the bottom of each page
6 we're going to see a signature and you have no reason
7 to dispute that you signed off on each page, right?

8 A. Right.

9 Q. Do you get to see this document before
10 you sign off on it?

11 A. They tell you to sign off each page
12 once they print it.

13 Q. Okay. And do you get the chance to
14 read it before you sign it?

15 A. Yeah. Yes.

16 Q. I'm just going to go kind of slowly
17 through this, but we're not going to go through this
18 interview word-for-word. I just want to get to the
19 end of your first interview with Internal Affairs.

20 Okay. So I'm on what's been previously
21 Bates stamped as City 152, it is the 16th page of
22 City-2, and looking at this document I see that there
23 is a question, is there anything else that you would
24 like to add that has not been addressed in this

1 interview? Answer, and then there's a handwritten
2 paragraph. And are you able to read this paragraph?

3 A. Yes.

4 Q. Okay. I would actually like it if you
5 are able to -- if you could read this paragraph out
6 loud just because I don't want to interpreting your
7 handwriting here.

8 A. I would like to document that Ted
9 Qualli has continued to attempt to create situations
10 for which he wants to argue with me and intimidate
11 me. He is subjecting me along with a few members of
12 the staff to a hostile work environment. Friday he
13 came into my office to yell at me and berate me about
14 PAL-related matters in his attempt to have me be
15 removed from the unit. I feel that the incident
16 involving Officer Klayman and Chase Trimmer was used
17 as a platform to drive personal agenda.

18 Q. At no point in this paragraph do you
19 mention Joe Sullivan; am I right?

20 A. I didn't mention him in this -- in this
21 situation because I felt that this was about the
22 incident involving two individuals. Ted Qualli had
23 called Sullivan and I had called Sullivan and
24 explained to him what's in this statement in terms of

1 Ted Qualli exaggerating what happened that day as
2 another way to create another situation that would
3 get me in trouble.

4 Q. Okay.

5 A. Because when this incident happened it
6 was an argument between two people and their
7 statements, and his communication to Sullivan was not
8 accurate in what actually happened.

9 (Simultaneous crosstalk.)

10 BY MS. ULAK:

11 Q. How is it inaccurate -- I'm sorry.

12 A. One, he was not there during the
13 incident. Before he wasn't answering my phone calls
14 and went directly to Sullivan who immediately took
15 his side, he sided with Ted Qualli and made certain
16 -- well, Ted Qualli and I called Sullivan to explain
17 to him that Ted Qualli had made some decisions like
18 sending everybody home without talking to me about
19 what took place and created a potential, you know,
20 panic in the unit when that was not necessary and
21 that's what I was referring to in this statement.

22 Q. Okay.

23 A. And then he came and yelled at me which
24 I also told Sullivan about it but he didn't do

1 anything about it, and I also wanted to let Conway
2 know that right before I was scheduled to come to my
3 interview he came into my office to yell at me.

4 Q. That's Ted Qualli came into you office?

5 A. Yes. So I felt like he was doing that
6 to -- to intimidate me as well as, you know, trying
7 to create another situation to make this situation
8 even worse.

9 Q. Okay.

10 A. So that's what I was referring to, him
11 yelling at me trying to provoke me I guess or
12 intimidating me because he knew I was going to
13 Internal Affairs. But all of this that's in the
14 statement I had spoken to Sullivan about and he did
15 nothing about the fact that Ted Qualli came into my
16 office yelling at me. I submitted a memorandum to
17 Sullivan in reference to this last incident that
18 happened before I went to my meeting.

19 Q. You sent a memorandum to him in
20 reference to Ted Qualli coming into your office and
21 yelling at all?

22 A. Yes, and he didn't do anything about
23 it.

24 Q. Okay. Was there anything else that you

1 were concerned about that you addressed with Brent
2 Conway during your interviews with Internal Affairs?

3 A. Yes, I was concerned because Conway
4 expressed to me that he tried close the case because
5 he couldn't find anything against me and he said I'm
6 not afraid to go up against deputies who like to
7 bully people, but this is clearly a witch hunt.
8 They're trying to close this case because I can't
9 find anything that you did wrong but Sullivan told me
10 or instructed me to keep digging.

11 Q. Let me stop sharing this.

12 To your knowledge, what was the outcome
13 of the Internal Affairs investigation?

14 A. When I did my exit interview, I was
15 told by the Deputy Commissioner Wimberly that I
16 should not leave the department because I had a good
17 working record and she said they didn't find
18 anything, so you should not let people run you off
19 the job. And I explained to her that this was about
20 my health and me going through everything that I went
21 through was jeopardizing my health and she suggested
22 that I take a nonpaid leave status, and I told her
23 that I would be willing to do that, but my year had
24 expired to be on family leave according to the rules

1 and at that point she called Deputy Commissioner
2 Coulter who was the approving -- the person that
3 would approve for me to go on nonpaid status medical
4 leave, but Deputy Commissioner Coulter denied the
5 request and was not letting me go out on nonpaid
6 status which forced me to retire.

7 Q. And I want to clear here, to your
8 knowledge, did the Internal Affairs investigation
9 sustain any wrongdoing on your part?

10 A. At that point, I didn't know because
11 Wimberly, Deputy Commissioner Wimberly who was in
12 charge of Internal Affairs told me they didn't find
13 anything. So to my knowledge they didn't show me
14 anything, they didn't give me anything. But in
15 her -- she explicitly told me they didn't find
16 anything, so I'm assuming everything was done and
17 over with at that time.

18 It wasn't until recently that I found
19 out that they put something in my record as far as
20 finding me guilty about stuff that is not accurate.

21 Q. Did you ever have a PDI hearing in
22 relation to this incident?

23 A. No, because according to Deputy
24 Wimberly they didn't find anything. I was never

1 notified of any wrongdoing. I was never given notice
2 that there was any wrongdoing or that they found me
3 guilty of anything. As far as I was concerned it was
4 over with and they didn't find anything.

5 Q. You were never disciplined for anything
6 related to this, right?

7 A. Nope. Nope.

8 Q. Okay. You had testified earlier
9 about -- about how you had Sergeant Pascucci speak
10 with Janice Little, am I remembering that correctly?

11 A. Yes.

12 Q. Okay. How was your working
13 relationship with Officer Little?

14 A. Officer Little is great with the kids.
15 The only thing is with Officer Little she likes to
16 deviate the rules to her advantage, and when I first
17 got to PAL Ted asked me to speak to her because she
18 would go and spend her own money to buy stuff for
19 PAL-related events which is a PAL rule that they're
20 not supposed to do.

21 So when I got there to PAL she already
22 had a situation like that before my arrival to PAL
23 and she wanted to get reimbursed for spending her own
24 money on PAL-related events that they had declined

1 her to do because the way that it works is that the
2 officers submit a memo requesting what they want and
3 then it goes through an approval process of what they
4 can and cannot do in terms of that program or event,
5 and whatever they get approved for in terms of
6 finances that's what they're allowed to spend.

7 And Sunny Li as the chief financial
8 officer would give them either a check or petty cash
9 to handle, you know, the finances.

10 The rule in place is that they're not
11 supposed to spend their own money, but Officer
12 Little, according to Ted Qualli she had did this
13 several times and right before I got there she did it
14 again and he did not want to reimburse her because it
15 was something that was becoming a habit of Officer
16 Little to get what she wants, you know, even though
17 stuff was declined. So we rectified that situation
18 by reimbursing her for that incident.

19 Fast forward, I would say less than a
20 year later she did it again. Again Ted Qualli and I
21 sat down with her and told her she cannot go in her
22 pocket to spend money. Sunny Li decided to reimburse
23 her again because there was an excess of funds in
24 other areas so she said I'm only going to do it

1 because we didn't spend everything in other areas
2 that we could reimburse her.

3 I counseled Officer Little about it and
4 told her she could not to do that again. So she then
5 went through the sergeant to submit a few memos to do
6 a dance program. The sergeant brought it to my
7 attention and according to the budget she could only
8 include 50 girls in this program but she wanted to do
9 the program for 100 girls. So she was declined,
10 denied the request to host this program for 100 girls
11 and was only approved for 50 girls, but Officer
12 Little decided that she would go in her pocket again
13 and spend her own money to fund this program and then
14 she waited about six months and tried to submit a
15 memorandum through Sunny Li for reimbursement, but
16 since we had closed the fiscal year that August Sunny
17 Li said she couldn't do it and would not reimburse
18 Officer Little for a third time since I was there for
19 going in her pocket.

20 So Officer Little was upset at me
21 because she said I should have fought for her to get
22 reimbursed, and I explained to her that I don't
23 handle that part of it and that she was already
24 warned and given a written warning about doing this,

1 but she decided to do it anyway.

2 Q. Okay. Ms. Cintron, let's maybe focus
3 this a little bit better.

4 You had testified earlier that she was
5 discussing the incident that occurred between Officer
6 Klayman and Chase Trimmer and you had Sergeant
7 Pascucci stop her because this was an active
8 investigation. What was she saying about this
9 incident, what was she talking about?

10 A. It was officer -- one of the officers
11 came up to me and told me that she was going around
12 to the other officers and trying to get them involved
13 in the incident. Basically from what I gathered --
14 gathered, she was trying to get them to say things
15 against Officer Klayman because they didn't like him.
16 They had a -- they didn't get along, and she was also
17 talking about, you know, like just the investigation
18 in general and she was not there when it took place.

19 So when officer -- I'm trying to think
20 what officer came up to me and told me about it. The
21 sergeant was right there, I said do me a favor, tell
22 Officer Little that this is an ongoing investigation
23 and because, you know, there's a policy that you're
24 not allowed to discuss an ongoing investigation, that

1 she needs to focus on work and refrain from talking
2 about an active investigation.

3 Q. Okay. Did any other people witness the
4 incident between Officer Klayman and Chase Trimmer?

5 A. Well, Sergeant Faust, Cassandra Harris
6 and I were in the office, we witnessed the yelling
7 but there was a few other civilians that worked in
8 that area that witnessed it.

9 Q. Okay. When you told Sergeant Pascucci
10 to speak with Officer Little, do you believe he
11 understood what you were asking him to talk to her
12 about?

13 A. I thought I was very clear that to tell
14 her that it was an ongoing investigation. I mean
15 those were the words I used, tell her it was an
16 ongoing investigation, to refrain from speaking on an
17 ongoing investigation.

18 Q. Okay. I'm going to show you what we're
19 going to mark as City-3.

20 Ms. Cintron, can you see this?

21 A. Yes.

22 Q. Okay. And looking at this, are you
23 able to identify what it is?

24 A. That's the letter.

1 Q. This is marked City-3, what letter?

2 A. The letter that Internal Affairs showed
3 me.

4 Q. Okay, I'm not showing you that.

5 If you take at look at the top it says
6 from, it says Lieutenant Evelyn Cintron, sent
7 Wednesday --

8 A. Oh, Nadarih, Nadarih McCauley.

9 Q. Yes.

10 A. Yeah, it just looked similar for a
11 second, I don't know.

12 Q. I can understand why you might think it
13 looks that way. That's why we're trying to be clear
14 here.

15 The subject line says office gossip and
16 it's marked as high importance?

17 A. Yes.

18 Q. Okay. I am just going to give you a
19 moment to read through this e-mail, you let me know
20 when you've had a chance to get this part and I'll
21 scroll down.

22 A. Can you move it up?

23 Q. Yep.

24 A. Okay. Move it up a little bit. Okay.

1 Q. Okay. What was the purpose of sending
2 this e-mail?

3 A. When this situation happened I spoke to
4 Ted Qualli and I spoke to Chase Trimmer. I went to
5 Chase Trimmer first because he had oversight over
6 Nadarih McCauley and I said to him we have a
7 situation here that we need to address with Nadarih.
8 Giving them the opportunity to speak to her about
9 this situation.

10 Chase Trimmer refused to speak to her
11 and he called Ted Qualli to come join us in the
12 meeting. I said -- as a matter of fact, I said as
13 matter of fact call Ted where he can be here present
14 while we discuss this because my understanding is
15 that you, as her immediate supervisor, refused to
16 talk to her about this. And then -- we called Ted
17 Qualli to join the meeting.

18 When Ted Qualli joined the meeting, I
19 told him what was going on, what was brought to my
20 attention and Ted Qualli immediately said -- he
21 started laughing and he said people can say whatever
22 the hell they want, and I said -- and I reiterated to
23 him that when there was a rumor about
24 misappropriation of funds coming from Ted Qualli, he

1 asked me to address the officers that were, you know,
2 starting this rumor and I gave him the courtesy to
3 sit down with the officers to ensure that this does
4 not happen in the workplace because it deviates from
5 the job that we have to do.

6 So whenever Ted Qualli had an issue
7 with officers, I would make sure we call the officers
8 in and we would discuss the matter and I would
9 instruct my officers to, you know, whatever they were
10 doing that was disrespectful to Ted that would
11 correct the situation, but he did not give me the
12 same courtesy. He laughed and said that people can
13 say whatever the hell they want and that he wasn't
14 going to say nothing to Nadarih. And I said are you
15 serious? You're not going to address this matter?
16 And he said no. So I had no other choice but to send
17 Nadarih this e-mail to let her know that this was my
18 position on the matter.

19 Q. Okay. So I want you to be --

20 A. Because they refused to take
21 disciplinary action or address her about the matter.

22 Q. Okay, but I want to be clear here, what
23 is the matter? When you say the matter, what is the
24 matter?

1 A. When you have an employee starting
2 rumors about the commanding officer and blatantly
3 being disrespectful, it undermines my command when
4 you're trying to cause all these problems on the
5 workplace, it was also becoming a hostile work
6 environment for me, which is what I wanted Ted to
7 address but he refused to do that. I mentioned this
8 to Sullivan who didn't do anything about it.

9 Q. Okay.

10 A. But called me after this letter was
11 forwarded to him to tell me that I am not to speak to
12 officer -- to speak to Nadarih or anybody else about
13 any of this. So not only my concerns were not
14 addressed, but they were laughing about it. They
15 didn't care how hostile the environment was for me.
16 They didn't care how I was being intimidated in the
17 workplace.

18 Q. Now, Ms. Cintron, I just want to turn
19 your attention to the second paragraph from the
20 bottom, it just says I did get a follow-up e-mail
21 from Ted stating that you denied being involved, but
22 acknowledged speaking to Officer Jackie Little who
23 was also mentioned as being involved.

24 Officer Little, is that the same -- is

1 that the same officer who is mentioned in the letter
2 to Internal Affairs?

3 A. Yes.

4 Q. Okay. What was the purpose of this
5 sentence mentioning Officer Little?

6 A. Because after we had that meeting, Ted
7 had sent me an e-mail saying she said she wasn't
8 involved in any of that, she, Nadarih, meaning
9 Nadarih, mentioned Officer Little as the one that was
10 involved.

11 Q. Okay.

12 A. So basically they were pointing the
13 fingers at each other. Officer Little and Nadarih
14 were pointing fingers at each other.

15 Q. Did you ever confront Officer Little
16 for spreading rumors about you and Officer Klayman?

17 A. Officer Little came to my office and
18 she made a comment that was very interesting to me
19 because she made a comment and said to me had you
20 booked my reimbursement, seriously I wouldn't have
21 done what I did. And when she made that remark I
22 felt that if this turns into something bigger I
23 didn't want to question her without proper
24 representation because there's a different process

1 for a civilians and there's a different process for
2 officers.

3 Had I questioned her without proper
4 representation then I would have been in violation of
5 questioning her about something that was an ongoing
6 investigation.

7 Q. How long did you work with Sergeant
8 Faust for?

9 A. How long what?

10 Q. How did you work with Sergeant Faust
11 for?

12 A. For the time that I was at PAL.

13 Q. Okay. And what was his shift while he
14 worked at PAL with you?

15 A. Both sergeants were supposed to rotate
16 shifts. They were supposed to be Monday through
17 Friday, eight to four for two weeks and then he would
18 switch to four to 12. When I first got there because
19 he was also handling administrative stuff, I allowed
20 him to stay eight to four for the time being until I
21 learned my way around, but when I tried to move him
22 back to his regular shift, rotating shift, he
23 complained to Sullivan who told me not to change his
24 shift. But the shifts between the sergeants are

1 supposed to rotate because all the officers work from
2 two to 10 and he was in charge of half those
3 officers.

4 Q. Okay.

5 A. And he was supposed to be checking on
6 the centers.

7 Q. But -- sorry, go ahead.

8 A. But the other partner was overseeing
9 the entire City while I kept Sergeant Faust eight to
10 four to kind of show me around because he had been
11 there for so long so he could, you know, show me
12 around how everything works.

13 Q. And -- oh, sorry.

14 A. And then he didn't want to switch back
15 to four -- two to 10 rather.

16 Q. When did you try to move him?

17 A. We actually had two meetings where we
18 discussed the length of time that he would be on day
19 work because I felt bad for Sergeant Pascucci --
20 first Sergeant Pascucci who was having to go from one
21 part of the City to the next to supervise officers
22 and we had discussed it in several meetings, but when
23 I went to move him from his shift, he made the call
24 to Sullivan and I was told to leave him alone.

1 Q. When did you go to move him from his
2 shift?

3 A. I can't remember the month or the date.
4 I can't remember the date or the month.

5 Q. Okay. I'm going to show you what's
6 been marked as City-4 or what I will mark as City-4.

7 A. Uh-huh.

8 Q. Give me one moment.

9 Looking at this it's a memorandum, it's
10 addressed to Sergeant Faust, it's from commanding
11 officer Police Athletic League. Are you able to see
12 it?

13 A. Yes.

14 Q. Okay. And does this memorandum look
15 like a memorandum you might have sent?

16 A. Yes.

17 Q. Okay. And what's the date at the top?

18 A. 11/6/17.

19 Q. And what is the subject of this memo?

20 A. Shift reassignment.

21 Q. So it was November of 2017 when you
22 chose to reassign Sergeant Faust's shift; is that
23 correct?

24 A. Yes.

1 Q. Okay.

2 A. But prior to that we had several
3 meetings about it.

4 Q. Okay. Okay.

5 A. So he knew this was coming because we
6 had discussed it previously.

7 Q. Okay.

8 A. This memo is a standard memo that you
9 give someone when you're going to move them because
10 you want to give them enough time to adjust their
11 home schedule, so you give them 30 days according to
12 policy. So this is standard when you're changing
13 someone's shift and it's a contractual agreement with
14 the FOP.

15 Q. Okay. So you would agree with me
16 though that moving him in November of 2017 was well
17 after when you first arrived at PAL, right?

18 A. Yes. According to the date, yes.

19 Q. Okay. And was this after the letter
20 was sent to Internal Affairs?

21 A. It was after the incident, but I don't
22 recall I had seen the letter by then.

23 Q. Okay. We discussed this earlier, the
24 letter was dated October 27, 2017, so this memo came

1 after the letter was sent or at least after the
2 letter was received by Internal Affairs. Would that
3 be accurate to say?

4 A. Well, what I'm trying to say is that I
5 don't know if I have gone and given my interview at
6 this time. I don't think I had gone and given my
7 interview which means I wouldn't -- I didn't know
8 about the letter.

9 Q. Okay. By the time that you had sent
10 that memo though, had you -- you had already
11 addressed your concerns about rumors with Nadarih,
12 right?

13 A. If -- if the date is before then, then
14 yes.

15 Q. Okay.

16 A. My decision to move Sergeant Faust had
17 nothing to do with the incident. This was something
18 we spoke about months prior. He signed off on it
19 months prior during our meeting because I would have
20 them sign off on our meetings and what we discussed
21 during our meetings, so he was aware of this way
22 before this incident.

23 Q. Okay. We know that you have testified
24 today that you had complained to Joe Sullivan about

1 complaints you had working at PAL. Did you make any
2 complaints to anybody else within the City of
3 Philadelphia?

4 A. I attempted to, before Paterson retired
5 being first deputy, Sullivan would be reporting to
6 him as second deputy. So I went to Paterson to talk
7 to him about the stuff that Sullivan was doing and he
8 directed me to go back to Sullivan and didn't want to
9 hear it, what I had to say.

10 Q. And what was the stuff that Sullivan
11 was doing that you were trying to complain about to
12 Paterson?

13 A. Undermining my command by having, you
14 know, subordinate staff report to him. Isolating me
15 by taking assignments that were under my purview to
16 handle. Having his sergeant listen in on my -- my
17 conference calls, siding with the PAL Board and it
18 being a conflict of interest because they support his
19 nonprofit, and him treating me less favorable than my
20 males -- the males that worked in the unit.

21 But when I went to speak to him -- when
22 I went to speak to him he said that I needed to go
23 back to Sullivan and he didn't want to hear it. He
24 was literally talking -- saying -- every time I tried

1 to express myself, he said I don't want to hear, I
2 don't want to hear, Evelyn leave, Evelyn leave,
3 Evelyn leave, I don't want to hear it, go talk to
4 him, go talk to him. He literally didn't want to
5 hear anything.

6 And I said, well, I'm coming to you
7 because as his supervisor this is policy, I'm
8 supposed to go to higher up if who I'm complaining
9 about is my immediate supervisor and, again, he said
10 go talk to him, go talk to him and he basically
11 kicked me out of the office and directed me to go
12 back to Sullivan.

13 When I went to the Sullivan's office,
14 Sullivan told me that better be the last time you try
15 to circumvent me and go to a higher rank, and I said
16 well, with all due respect if I'm complaining about
17 you I followed policy. So my job was to go through
18 your supervisor because I'm not getting any results
19 with you and you're not listening to any of my
20 concerns and you keep siding with the Board.

21 So we basically had that conversation,
22 and he told me at that point that I were to never
23 contact anybody above him ever again.

24 Q. Okay.

1 A. So he basically cut off my opportunity
2 to report through the departmental means according to
3 policy.

4 Q. Did you have other means within the
5 City of Philadelphia to report these concerns?

6 A. When I did my interview with Internal
7 Affairs, they gave me an EEOC complaint form and they
8 advised me to fill out an EEOC complaint form. But
9 being that Sullivan who was the person I'm
10 complaining about was interfering with the
11 investigation by calling the detective and telling
12 him to keep digging, I knew that it would not be
13 investigated fairly. So I decided that I would go
14 through the City, through my other means of reporting
15 an EEOC complaint.

16 Q. Okay. We're going to have to back up a
17 little bit here.

18 At Internal Affairs you received an
19 EEOC form and you did not fill it out. How did you
20 know Joe Sullivan was telling people to keep digging,
21 how do you know it was him?

22 A. Conway told me.

23 Q. Brent Conway told you during your
24 Internal Affairs investigation that Sullivan was

1 telling you to keep digging?

2 A. Yes. He said he tried to close the
3 case several times and that they told him to keep
4 digging. That Sullivan told him to keep digging, and
5 he told -- that's when he told me that I would go
6 against up any deputy because I know a witch hunt
7 when I see -- you know, I know one when I see it.
8 I've been doing this for too long.

9 Q. Okay. So then did you make an EEO
10 complaint to the City of Philadelphia?

11 A. No, I didn't because I knew that it
12 would not be done fairly given what was going on with
13 the current investigation and how, you know, he was
14 trying to interfere in the investigation. And the --
15 the department is known for, you know, minimizing
16 what's going on if it's against a higher up. So I
17 knew that it would not be a fair investigation that
18 would go on if you have the person that I'm
19 complaining about telling an investigator to keep
20 digging to see if he finds something negative against
21 me.

22 Q. Ms. Cintron, could you have made a
23 complaint to the City of Philadelphia outside of your
24 departmental means?

1 A. What was that?

2 Q. Could you have made a complaint to the
3 City of Philadelphia outside of your departmental
4 means?

5 Could you have made a complaint to a
6 different office?

7 (Simultaneous crosstalk.)

8 THE WITNESS: I made a complaint to the
9 Department of Human Services, the complaint
10 that I made. I went outside of the department
11 for fear of further retaliation.

12 BY MS. ULAK:

13 Q. Who did you make that complaint to?

14 A. I believe it was the City -- I'm not
15 sure. The Department of Human EEOC unit, the City's
16 EEOC unit --

17 Q. Well, there's --

18 THE WITNESS: If that's what it's
19 called?

20 BY MS. ULAK:

21 Q. So there is the EEOC -- I'm sorry.

22 A. No, I was asking Mr. Green is that what
23 it's called because I can't remember what the name of
24 the office is called.

1 MR. GREEN: If you can't remember, you
2 can't remember.

3 THE WITNESS: Okay.

4 BY MS. ULAK:

5 Q. Okay. I'm going to ask this a
6 different way, please let me get my question out,
7 okay?

8 I know that you filed a complaint with
9 the EEOC under the representation of counsel.

10 Did you make any complaints to perhaps
11 the City of Philadelphia Employee Relations unit, to
12 the Mayor's Office of Labor?

13 A. No, I didn't know that was an option --
14 I don't recall if that was an option.

15 Q. Did you make a complaint to your Union?

16 A. Yes, I called the Union and they told
17 me because I was a lieutenant they could not
18 represent me.

19 Q. But you were represented by the Union
20 at your Internal Affairs investigation?

21 A. The Internal Affairs investigation, any
22 officer giving a statement regardless of rank gets
23 represented by an attorney.

24 Q. Okay. You're saying the Union couldn't

1 help you with this complaint because you were a
2 lieutenant --

3 A. With the rank of lieutenant because
4 you're in management is different than representing
5 an officer in -- in investigations. But yes, I did
6 contact my Union.

7 Q. Okay. Ms. Cintron, you had mentioned
8 earlier some health issues, I just want to talk to
9 you briefly about that and we are coming towards the
10 end of this deposition, so there is end in sight.

11 In terms of health issues, have you
12 ever had cancer?

13 A. Have I ever had cancer?

14 Q. Yeah.

15 A. No. I have -- I had tumors that they
16 had to remove that they checked for cancer for, yes.

17 Q. Okay. Do you currently treat for any
18 medical conditions?

19 A. Yes.

20 Q. What do you treat for?

21 A. I have -- I have two -- I have
22 hypothyroidism and they recently found two small
23 tumors, one in my pituitary gland and one in -- like
24 behind -- I forget what other part. Behind my eye

1 and my pituitary gland.

2 Q. Why did you go out on leave from the
3 City of Philadelphia?

4 A. That was due to stress, anxiety,
5 depression and PTSD-related symptoms.

6 Q. And when did you -- when did you treat
7 for that? When -- strike that.

8 A. I think it started -- it started like
9 the end -- I believe the middle of 2017, it started
10 after Sullivan was there.

11 Q. Prior to that, had you ever treated for
12 any mental health conditions?

13 A. No, not --

14 MR. GREEN: Can you repeat that
15 question, please?

16 Before you answer, Evelyn, before you
17 answer, I just need the question repeated.

18 MS. ULAK: Renee, I'm sorry, can you
19 just repeat the question back. I don't
20 remember what I asked.

21 THE COURT REPORTER: Sure.

22 * * * * *

23 (Whereupon, the requested portion of
24 the testimony was read back by the court

1 reporter.)

2 * * * * *

3 MR. GREEN: Thank you.

4 THE COURT REPORTER: You're welcome.

5 THE WITNESS: Prior to that I -- I --
6 like everybody I got depressed once in a while
7 but it was never to the extreme of me having
8 to go to a specialist about it.

9 BY MS. ULAK:

10 Q. When did you start going to a
11 specialist?

12 A. 2017.

13 Q. Ms. Cintron, who replaced you as
14 commanding officer of PAL?

15 A. I don't know who replaced me. I think
16 it was a male captain selected by Ross who got
17 promoted -- promoted thereafter a few months later
18 and then they could -- the current Deputy
19 Commissioner Dahl-Campbell.

20 THE COURT REPORTER: I'm sorry, what is
21 his last name?

22 THE WITNESS: Dahl-Campbell.

23 MS. ULAK: D-A-H-L hyphen Campbell.

24 BY MS. ULAK:

1 Q. The gentleman who was there before
2 Deputy Dahl-Campbell, do you know what his race was?

3 A. He was a black male selected by Richard
4 Ross to oversee the unit when I was out.

5 Q. And then do you know when Dahl-Campbell
6 became the commanding officer of PAL?

7 A. She became the deputy commissioner of
8 PAL after this captain who got promoted to inspector
9 I believe --

10 Q. Okay. You said Deputy Commissioner --

11 A. -- which was a few months later.

12 Q. You say Deputy Commissioner --

13 A. Can you repeat that?

14 Q. I'm sorry, I think we're having an
15 audio lag, I think that might be part of the problem.

16 You say deputy commissioner of PAL, do
17 you mean commanding officer of PAL?

18 A. You're talking about the inspector, the
19 person who got promoted to inspector?

20 Q. No, I'm talking about Krista
21 Dahl-Campbell.

22 A. Right. She would have gotten assigned
23 by the deputy or the commissioner.

24 Q. And just so we're clear, she's a woman?

1 A. Yes.

2 Q. Do you know who currently holds the
3 position of commanding officer of PAL?

4 A. No. All I know is that Deputy
5 Commissioner Campbell was working with me to get a --
6 the 26th District open, center open which was --
7 which had the community in an uproar because Dahl had
8 gotten funding for the center three years prior to
9 open up the 26th District PAL center --

10 Q. Hang on. Ms. Cintron -- Ms. Cintron,
11 is this about who replaced Krista Dahl-Campbell as
12 the commanding officer of PAL?

13 A. No.

14 Q. Okay.

15 A. I'm just telling you what I'm familiar
16 with as far as the captain.

17 Q. Okay. Yeah, then you don't need to
18 continue. This is not responding, there's no
19 question pending.

20 A. Okay. Okay. No problem.

21 Q. While you were out on leave, did Deputy
22 Wimberly ever leave you voicemail?

23 A. Yes.

24 Q. Okay. And what was the substance of

1 that voicemail?

2 A. She called me, she left a message
3 because I didn't answer the phone call and she left a
4 message basically stating that she -- I can't say
5 word-for-word because I don't have it in front of me,
6 but something along the lines that she heard I was
7 under the weather. She mentioned something about the
8 job and if I needed to discuss anything work-related
9 to give her a call, that -- and that she hopes I feel
10 better.

11 Q. Okay. But --

12 A. I don't know all the words, but that
13 was the gist of it.

14 Q. Okay. What was your understanding of
15 why she left you that voicemail?

16 A. Well, I returned her phone call once I
17 realized she called and I had missed the call and we
18 talked about what was going on and how I felt about
19 Sullivan and told her that he was using his authority
20 to intimidate me and to constantly cause a stressful
21 work environment. And I explained to her that was
22 the reason why I went out because between people
23 coming in my office to yell at me and getting a call
24 from him every day to be yelled at over whatever the

1 Board told him without getting my side of the story
2 was becoming very stressful to me and I was
3 physically getting sick, like throwing up and just
4 not like feeling well at all.

5 Q. Ms. Cintron, where did you go to work
6 after you retired from the police department?

7 A. What was that?

8 Q. Let me ask it a better way.

9 After you retired from the police
10 department, did you get another job?

11 A. Not right away because physically I
12 couldn't, but once I started feeling a little bit
13 better I tried to obtain employment. For whatever
14 reason I was not getting hired, I would go through
15 the whole process and then once they communicated
16 with the department I was not getting hired and I did
17 get hired by the one company.

18 I worked there a few months, was doing
19 well, even according to my supervisor there, and I
20 think on a Friday or Thursday we had a -- a Zoom
21 meeting before we went out to our conferences and my
22 boss at the time gave me my accolades of how well I
23 was doing, how many accounts I had secured.

24 And following the -- the -- when we all

1 came back from the conferences that we all had to go
2 to, my co-worker who I was assigned to a specific
3 conference told me that my boss had spoke to Deputy
4 Commissioner Coulter at the conference and he said I
5 don't know what's coming but is there anything that
6 you need to speak to Greg Doren about? And I told
7 him no because when I applied for the job, without
8 bad mouthing the City, I told him that, you know, I
9 had left in, you know, bad terms because of what
10 was -- you know, because of my stress and stuff like
11 that.

12 And I think it was that Monday or
13 Tuesday that he called me to tell me that they no
14 longer needed me.

15 Q. Okay. So you testified that there was
16 a conversation between Deputy Coulter and Greg Doren?

17 A. Yes.

18 Q. And after this conversation you were
19 told they no longer needed you?

20 A. Yes.

21 Q. How do you know this conversation
22 occurred?

23 A. He called me, then he told me that if I
24 wanted to collect my bonus to write a memo. He told

1 me it could be a two-liner, just write something
2 saying that -- that you're resigning and that's the
3 only way I could give you the bonus, you know, and I
4 did it because I was hoping he would pay me the bonus
5 I earned, but that never happened.

6 Q. Ms. Cintron, my question was how do you
7 know this conversation between Greg Doren and Deputy
8 Coulter occurred?

9 A. According to Jeff, my co-worker, he
10 spoke to Greg Doren who told him and he kind of like
11 told me -- he told me about it.

12 Q. Okay. What's Jeff's last name?

13 A. I can't recall Jeff's last name.

14 Q. And where -- and Jeff -- where was Jeff
15 in all of this? How does he know the conversation
16 occurred?

17 A. He -- according to him, he spoke to
18 Greg Doren the night before because since he was a
19 senior employee with the company he had to report to
20 Greg every night as to what was going on, how we were
21 doing in the conference. And he told me when we were
22 heading the next day to the conference again he told
23 me I spoke to Jeff last night -- I mean I spoke to
24 Greg last night and Greg mentioned that he spoke to

1 your old boss. Do you know a Christine Coulter and I
2 told him yes. He said well, you may want to talk to
3 Greg and -- Greg about if there's anything that you
4 need to tell him. I said there's nothing I need to
5 tell him because I was completely honest with him
6 when I got the job, and that's all he said to me.
7 And then like I said a few days later I was being
8 told I wasn't needed.

9 Q. Okay. Ms. Cintron, you testified
10 earlier about a lot of complaints that you were
11 making to Joe Sullivan regarding PAL and the way that
12 it was run, did you ever make these complaints in
13 writing anywhere?

14 A. Yes. I sent him several memos,
15 e-mails.

16 Q. Okay. And were you ever disciplined
17 for making these complaints?

18 A. Not -- I never was disciplined. I was
19 just ignored and nothing ever happened, he would
20 always side with the Board.

21 MS. ULAK: Those are all the questions
22 I have for you. Thank you.

23 MR. GREEN: I have just a couple.

24 MR. GOLDEN: Ike, just -- can I --

1 quick question?

2 MR. GREEN: Oh, okay.

3 MR. GOLDEN: We can go off -- well, let
4 me keep this on the record just because it's
5 easier this way, quicker.

6 I have some follow-up clarification
7 questions. Do you want -- would you like to
8 go first or would you like me to go first and
9 then maybe you can -- if there's anything that
10 follows up out of my clarification, maybe it's
11 easier or -- but I defer to you on how you'd
12 like to handle that?

13 MR. GREEN: Let -- let me go first, if
14 you don't have a problem with it.

15 MR. GOLDEN: No, I don't.

16 MR. GREEN: Okay. All right. Thank
17 you.

18 * * * * *

19 CROSS-EXAMINATION

20 * * * * *

21 BY MR. GREEN:

22 Q. Ms. Cintron --

23 A. Yeah.

24 Q. -- excuse me, you testified that there

1 was an employee about whom you received a phone call
2 from Daryl Clark, a police officer, a young police
3 officer; is that right?

4 A. Yes.

5 Q. Okay. What was the nature -- what --
6 what did Mr. Clark say to you during the course of
7 that phone call?

8 MS. ULAK: I'll object. Asked and
9 answered. She testified to it several times,
10 but...

11 MR. GREEN: Okay, I just want to be
12 clear on it.

13 MS. ULAK: Okay.

14 BY MR. GREEN:

15 Q. What did Mr. Clark say to you during
16 the course of that phone call?

17 A. He had called me stating that Ron
18 Rabena was asking about -- called him to inquire
19 about the young man that he wanted transferred in the
20 unit and I explained to Daryl Clark that I couldn't
21 move him given the fact that he didn't qualify to
22 come to the unit and he said well, I think you should
23 transfer him in or I'm going to start making some
24 phone calls about you and he said starting with

1 Commissioner Ross --

2 Q. Now, wait a minute. Wait a minute.

3 Before -- I have to take this in pieces.

4 Who is Ron Rabena?

5 A. Ron Rabena is a Board member and at the
6 time he was the VP of PAL.

7 Q. He was the VP, he was the
8 vice-president of PAL?

9 A. Yes.

10 Q. Okay. At the time that this phone call
11 took place?

12 A. Yes. Yes.

13 Q. So he was on the PAL Board?

14 A. Yes.

15 Q. Okay, and did Mr. Ron Rabena mention
16 the name of the employee that he wanted to be placed
17 at PAL or to remain at PAL, the police officer?

18 A. He mentioned the same person -- he
19 mentioned the same person that he had asked me to
20 transfer in and the same person that worked for
21 Captain Francis at the 17th.

22 Q. I'm sorry, he worked for captain whom?

23 A. Francis at the 17th. He worked at the
24 17th District.

1 Q. Do you recall the time frame in which
2 he worked at the 17th, to the best of your
3 recollection?

4 A. 2017, 2018 I believe. For sure 2017.

5 Q. And you don't remember the young man's
6 name?

7 A. It's on some of the documents, but I
8 can't recall it, you know, off the top of my head his
9 name.

10 Q. Okay. But you believe that you have
11 them in your documents somewhere, is that it?

12 A. Yes. Yes.

13 Q. Now, did you mention to Mr. Rabena the
14 policy with respect to assigning officers to PAL
15 units?

16 A. Yes, several times.

17 Q. Or PAL facilities?

18 A. Yes.

19 Q. Okay. And did Mr. Rabena also have a
20 relationship with a company in connection with his
21 employment?

22 A. Ron Rabena does the Hero Scholarship
23 fundraiser. He assists in the Hero Scholarship
24 fundraiser that is -- that was or used to be ran by

1 Sullivan.

2 Q. Okay. And is Mr. Rabena affiliated
3 with Allied Universal Security?

4 A. Yes, he's -- yes, he's the president.

5 Q. And Daryl Clark is the -- I'm sorry,
6 Daryl Clark was the City Council president, correct?

7 A. Yes.

8 Q. Do you know whether Mr. Clark spoke to
9 Deputy Commissioner Sullivan?

10 A. I don't know if he spoke to him.

11 Q. All right. Excuse me. Hold on for one
12 second, please. All right.

13 And was there a lady on your Board
14 named Maureen -- on the PAL Board named Maureen Rush?

15 A. Yes.

16 Q. And who is Ms. Rush?

17 A. Maureen Rush is the chief director at
18 University of Penn, I believe that's her title, in
19 charge of the police department there and she's also
20 a Board member.

21 Q. Did Mr. Rush -- was Ms. Rush ever
22 employed by the City of Philadelphia Police
23 Department?

24 A. Yes. She retired as a lieutenant with

1 the police department.

2 Q. Excuse me. Did Mr. Rush ever call you
3 in connection with your relationship on the PAL
4 Board?

5 A. Yes.

6 Q. Okay. Did Ms. Rush ever call you with
7 respect to any issues regarding the men on the PAL
8 Board or the men affiliated with PAL organizations?

9 A. Yes. She -- she arranged a meeting
10 with me and when I went to meet her, she spoke to me
11 about the PAL Board. Do you want me to elaborate?

12 Q. When did she call you -- Ms. Cintron,
13 this is a different question. When did Ms. Cintron
14 (sic) -- when did Ms. Rush call you in connection
15 with the meeting regarding about with the PAL Board?

16 A. This was some time in 2017.

17 Q. This was in 2017?

18 A. Yes.

19 Q. Okay. Did that meeting occur?

20 A. Yes.

21 Q. And where did that meeting occur?

22 A. She said she didn't want to meet in her
23 office, so she had me meet her at a restaurant near
24 the University of Penn.

1 Q. And what -- what was discussed during
2 the course of that meeting?

3 A. When I first arrived I started talking
4 about programs because I thought that's what we would
5 discuss according to the conversation I had with her
6 over the phone and according to what Ted Qualli had
7 told me when he spoke to me that Maureen Rush wanted
8 to meet with me.

9 But when I went down there she began to
10 talk to me about letting PAL -- and Ted Qualli run
11 PAL, she stated -- I asked her who put her up to this
12 to have this conversation with me and I mentioned was
13 it Ron Rabena, Ted Qualli, Bernie Prazencia and she
14 said yes, they figured that we could have a talk
15 woman to woman. You need to -- they're concerned
16 about what's going on at PAL. They do not want this
17 MOU to be implemented, and she began to tell me that
18 I should let Ted run the show and she stated that I
19 should just put my legs up and collect my check.

20 She also mentioned let the men handle
21 this and she also mentioned that it's not going to
22 be -- go well for me if I continue to fight them on
23 the things that they're trying to do.

24 Q. Okay. Now, you testified -- you

1 mentioned the name Mr. Rabena, and, who -- okay, and
2 that was another name that you mentioned.

3 A. Bernie Prazencia.

4 Q. Mr. Prazencia, who is Mr. Prazencia?

5 A. He was vice chair of the PAL Board at
6 the time. He later became chair.

7 Q. Did either Mr. -- did Mr. Prazencia
8 ever ask you to perform any act on behalf of someone
9 that he recommended to you to either employ or
10 assign?

11 A. No.

12 MR. GREEN: All right. I think that's
13 about it for me.

14 MR. GOLDEN: Thank you.

15 * * * * *

16 CROSS-EXAMINATION

17 * * * * *

18 BY MR. GOLDEN:

19 Q. Ms. Cintron, I'll try to be quick with
20 my questions and they mostly -- just try to clarify
21 some things that we've talked about today.

22 When you became the commanding officer
23 of PAL, was Ted Quality -- pardon me, Ted Qualli
24 already the executive director?

1 A. Yes.

2 Q. Do you know how long he had held
3 that -- pardon me.

4 Do you know how long he had been
5 serving as executive director?

6 A. Approximately a year and a half or so.

7 Q. Okay. Just so a year and a half before
8 you --

9 A. From my recollection, yes.

10 Q. -- before you became the commanding
11 officer?

12 A. Yes.

13 Q. You mentioned earlier the programs
14 team, are there any other teams within PAL that you
15 remember, like specific teams within the
16 organization?

17 A. So they have like the fiance team which
18 is all management. They have all the programs team,
19 activities team, you know, event coordinators.

20 Q. The programs team that you mentioned
21 earlier, do you recall the names of the City
22 employees that were on the programs teams?

23 A. Nadarih McCauley, Chase Trimmer, a few
24 officers they would invite them to come in from the

1 center so they could give some input and I was in
2 charge of the programs team.

3 Q. So just so I -- forgive me to correct
4 this on the record, but Chase Trimmer was a civilian
5 employee, correct?

6 A. Yeah.

7 Q. And -- and what was the first name of
8 McCauley?

9 A. Nadarih.

10 Q. Oh, Nadarih, and Nadarih is also a
11 civilian employee, correct?

12 A. Yeah. She was -- she was -- she was
13 a -- she would sit in the meetings as a coordinator
14 because she was hired to be a PAL coordinator.

15 Q. So just so I'm clear, Mr. Trimmer and
16 Ms. McCauley were PAL employees, correct?

17 A. Yes. Chase Trimmer was the
18 supervisor -- was her supervisor and she sat in the
19 meetings as a coordinator because whatever we decided
20 at the meetings she would have to coordinate with the
21 officers at the center.

22 Q. You had talked about Officer Little and
23 some reimbursement issues, you mentioned that there
24 are rules governing reimbursement for officers; is

1 that correct?

2 A. Yes.

3 Q. Have you ever seen those rules?

4 A. Yes.

5 Q. Okay. And what are they -- where --
6 where did you see them?

7 A. That's a PAL rule and the -- I saw it
8 in the handbook, employee handbook, as well as I
9 discussed it with Ted Qualli and Sunny Li because
10 they were having these issues with Officer Little.

11 Q. The -- the handbook you mentioned, is
12 that a PAL employee handbook?

13 A. Yes.

14 Q. Did you have to sign an acknowledgment
15 for that handbook?

16 A. Do I have to sign an acknowledgment?

17 Q. For that handbook.

18 A. No. No, it's just a document that they
19 have there.

20 Q. And just so I can clear this up in --
21 because we've covered a lot.

22 A. I also -- I also --

23 Q. Okay, hold on. Hold on.

24 MR. GOLDEN: Renee --

1 THE COURT REPORTER: She was cutting
2 out. I just wanted to make sure I got it. Go
3 ahead, ma'am, finish.

4 THE WITNESS: Because Ted Qualli was
5 having these problems with the officers, I put
6 out a memorandum, a commander's order that
7 they were not allowed to go in their pocket.
8 Basically reiterating what the PAL policy
9 stated.

10 BY MR. GOLDEN:

11 Q. We have -- during the deposition you've
12 referred to both police officers and civilian staff
13 and just -- this helps when the lawyers are looking
14 at this later, you know, being consistent in the
15 transcript, when you testify or refer to civilian
16 staff, you are referring to PAL employees; is that
17 correct?

18 A. Yeah.

19 Q. Okay. Did any of the PAL employees
20 have the ability to set your schedule?

21 A. No.

22 Q. Did any of the PAL employees have the
23 ability to discipline or reprimand you?

24 A. No.

1 Q. Okay. Ms. Cintron, when you became the
2 commanding officer, do you know how many centers PAL
3 was operating in the City?

4 A. Fifteen.

5 Q. And the Wissinoming -- Wissinoming
6 Center, you said that was in a church, correct?

7 A. Yeah.

8 Q. And that was -- did PAL own that
9 building?

10 A. No.

11 Q. Of the 15 centers that PAL operated,
12 you testified that PAL owned the Rizzo and the Cozen
13 Center, were there any other centers that PAL owned?

14 A. That was it that I could recall.

15 Q. Do you know in the centers that PAL did
16 not own, so I'm excluding the Rizzo and the Cozen PAL
17 Centers, did PAL have any leases with those building
18 owners?

19 A. Yes.

20 Q. And have you seen those leases?

21 A. I got to see maybe one or two because
22 Ted would not show them to me.

23 Q. Do you recall which centers leases --
24 which releases -- I'm sorry, that was poorly worded.

1 Which -- for which PAL centers did you
2 see the lease?

3 A. Wissinoming because we were dealing
4 with that situation and the 26th District PAL.

5 Q. And for the centers where PAL rents or
6 has a lease, does it pay rent to those building
7 owners?

8 A. Yes, the rent is different for every --
9 every center according to Ted Qualli because that was
10 the agreement that they came up with to get the -- to
11 get the lease on those buildings. Some were also
12 City owned buildings like rec centers.

13 Q. Do you know who negotiated the terms of
14 those leases?

15 A. No.

16 Q. Do you know -- did those -- in the
17 lease that you saw, did it have any provisions
18 relating to repair and upkeep responsibilities?

19 A. Well, the 26th District was supposed to
20 be open with the funds that they received from a few
21 years prior and because we were getting such -- we
22 were going to get such cheap rent, Ted agreed in my
23 presence during a meeting with the priest that some
24 repairs would get done there. But when it came to

1 opening up the center, Ted did not -- stated that the
2 money went in an investment account and they didn't
3 budget for it.

4 Q. Do you know who was responsible for
5 setting PAL's budget?

6 A. We would sit down at headquarters, go
7 over budget items, some stuff Ted would express that
8 per the Board they were not to be touched and they
9 were to be left alone, and the stuff that we could
10 make decisions on we would make decisions but at the
11 end a lot of the stuff that I recommended would get
12 changed or Ted would change it.

13 So what we discussed in terms of
14 budgeting never actually went through the way that we
15 discussed it because changes were made at the Board
16 level.

17 Q. So who had -- who had final approval to
18 set the budget, do you know?

19 A. The Board would be final approval.

20 Q. Do you know -- you had talked earlier
21 about closing the Wissinoming Center, apart from
22 yourself, do you know who else had authority to close
23 the PAL center?

24 A. PAL, PAL Board, Ted Qualli.

1 Q. There are couple of names that you --
2 were referenced today, I just want to clear up.

3 Keith Falco is that a -- is he a police officer?

4 A. He's a police officer that works PAL
5 headquarters selected by Sergeant Faust.

6 Q. And Officer Ragucci; is that correct?

7 A. Yes. Officer Ragucci is another
8 officer that works procurement at PAL headquarters
9 also selected by Sergeant Faust.

10 Q. And Sergeant Faust is a City employee;
11 is that correct?

12 A. Yes.

13 Q. And Police Officer Little, she is
14 a police -- pardon me, a City employee; is that
15 correct?

16 A. Yes.

17 Q. You had talked earlier today about both
18 general board meetings and decision-making meetings
19 and you would attend the general board meetings. Do
20 you recall that?

21 A. Yes. The general board meetings are
22 more for the public to -- to let them know what PAL
23 is doing. No decisions are made at those meetings.

24 Q. Do you recall how often those meetings

1 occurred, the general board meetings?

2 A. Quarterly.

3 Q. And the decision-making meetings, do
4 you know how often they occurred?

5 A. Monthly.

6 MR. GOLDEN: Hold on. I just
7 dropped -- somebody just dropped off.

8 THE COURT REPORTER: Off the record.

9 * * * * *

10 (Whereupon a discussion was held off
11 the record.)

12 * * * * *

13 MR. GOLDEN: So, I think -- Renee, can
14 you read the last question?

15 MR. GREEN: Can you read that question
16 and the question before that?

17 THE COURT REPORTER: Sure. No problem.

18 * * * * *

19 (Whereupon, the requested portion of
20 the testimony was read back by the court
21 reporter.)

22 * * * * *

23 BY MR. GOLDEN:

24 Q. So, Ms. Cintron, do you recall -- do

1 you know how often the decision-making meetings
2 occurred?

3 A. Ted Qualli with me and Bernie Prazencia
4 with Ron Rabena once a month, sometimes twice a
5 month.

6 Q. And do you know of those how many you
7 were excluded from?

8 A. All of them except the one when I first
9 got there.

10 Q. And do you -- what -- what evidence do
11 you have that you should have been included in those
12 meetings?

13 A. When I first got there I was told -- I
14 was invited to that first meeting with Bernie
15 Prazencia and Ted Qualli and they told me that as a
16 commanding officer I will be at those meetings
17 because that's when all the decision making was done.

18 Q. Apart from those statements, anything
19 else that relates to your ability to be in those
20 meetings?

21 A. After that Ted started -- would go to
22 the meetings alone. They wouldn't notify me when the
23 meetings were taking place and Ted would come back
24 with the decisions that were already made. And I --

1 Q. I appreciate that -- go ahead.

2 A. And I explained to him that it's hard
3 for me to follow some of their requests or decisions
4 because it would violate things on the police side in
5 terms of changing the officers' shifts and things
6 like that, that were in violation of contractual
7 agreement with the FOP or policy.

8 Q. Did civilian staff have the ability to
9 set police officers' schedules?

10 A. No.

11 Q. Okay. Did you have a job description
12 that detailed what you did as the commanding officer?

13 A. No.

14 Q. Okay.

15 A. That's what prompted the Memorandum of
16 Understanding.

17 Q. Okay. When -- prior to yourself, I
18 believe it was officer -- Commanding Officer Eddis is
19 who served as the commanding officer of PAL; is that
20 correct?

21 A. Yes.

22 Q. Do you know how many of those
23 decision-making meetings he was involved in?

24 A. No.

1 Q. Okay. Do you recall any documents that
2 discussed or set your authority as the commanding
3 officer of the PAL unit?

4 A. No, that's why we -- the commissioner
5 wanted the MOU so that we can outline what each of us
6 was supposed to be doing and how we were supposed to
7 be working together.

8 Q. Do you know who decides which programs
9 are run at each PAL center?

10 A. The officers, for the most part, will
11 ask what programs -- will have a set of programs that
12 they want to run at their center but everything has
13 to be approved through -- through PAL. They'll have
14 their ideas, they'll submit their ideas, sometimes
15 they're approved, sometimes they're not, depending on
16 the budget.

17 Q. You had talked about having equal
18 authority to Ted, who -- who told you that you would
19 have equal authority to Ted?

20 MR. GREEN: I'm sorry, can you repeat
21 that question, please?

22 MR. GOLDEN: Sure.

23 Earlier in the deposition she had
24 talked about having equal authority,

1 Ms. Cintron had talked about having equal
2 authority to Ted.

3 BY MR. GOLDEN:

4 Q. And my question was, Ms. Cintron, who
5 told you that you would have equal authority with --
6 with Mr. Qualli?

7 A. When I went to the unofficial interview
8 with the PAL Board when I first started, that's what
9 they explained to me as per Commissioner Ross.

10 Q. Who on the Board specifically do you
11 recall telling you that?

12 A. At that meeting there was at least 15
13 Board members including Ron Rabena and Bernie
14 Prazencia and Ted Qualli.

15 Q. Okay, but what I'm asking is which of
16 those Board members told you you have would equal
17 authority?

18 A. I believe it was either Ron Rabena or
19 Bernie Prazencia, I can't recall but they were the
20 two main ones speaking. The rest just asked random
21 questions as to what -- what I would do in different
22 circumstances as it pertains to, you know, the
23 officer and discipline or they would give me like
24 little scenarios, like what you would do if an

1 officer did XYZ, you know, and -- but the ones that
2 were mainly describing what my job duties would be
3 was Bernie Prazencia and Ron Rabena.

4 Q. And apart from --

5 A. And I had even had the conversation
6 with Ted Qualli.

7 Q. And did -- okay. So Ron and Bernie
8 told you that, anyone else told you that you would
9 have equal authority with Ted?

10 A. He said Ted Qualli like when we would
11 speak, he said this is what they told me when I --
12 before I even got there at the meeting. Then when I
13 got there Ted and I had several conversations and he
14 said we would -- you know, we're supposed to work
15 together to do XYZ, to run the unit and he explained
16 that the previous commanding officer Eddis didn't
17 want to contribute to running PAL which is why they
18 got rid of her.

19 He referred to Eddis as lazy and didn't
20 want to do the job. Ted Qualli said so I have to
21 take over some of his responsibilities, at which time
22 I told Ted well, I'm here now, you can relinquish my
23 authority back to me because I will do my job.

24 Q. Are there any documents in which you're

1 aware -- that -- and I'm going to leave aside the
2 Memorandum of Understanding, so I'm asking about
3 documents apart from that.

4 So apart from the Memorandum of
5 Understanding, is there any document that you're
6 aware of that states you have equal authority to Ted
7 Qualli?

8 A. I didn't see any document about that at
9 all. I didn't see any documents about that at all,
10 and because there started to become some conflicts
11 that MOU was to become that document.

12 Q. And the same -- same question in a
13 sense, apart from the MOU, are there any documents
14 that you have seen that state that you would be
15 responsible for the budgeting at PAL?

16 A. No. I just answered that, no. That's
17 the reason why they were implementing the MOU.

18 Q. Okay. So that's the same for both, the
19 equal authority and the budgeting, there are no
20 documents apart from the Memorandum of Understanding?

21 A. Which was supposed to be put in place
22 but Sullivan stopped it and the Board did not want
23 it.

24 Q. Right, I hear that. But I just -- so

1 and -- but that would be the only document of which
2 you are aware that states you have equal authority to
3 Ted or responsibility for the budget; is that
4 correct?

5 A. It would have outlined our job duties,
6 yes.

7 Q. Okay. So I just want to be clear
8 though that that is the only document of which you
9 are aware that speaks to your job responsibilities as
10 the commanding officer; is that correct?

11 A. Yes.

12 Q. Okay. Do you -- okay.

13 The incident with Chase Trimmer and
14 Officer Klayman -- I don't need to ask that.

15 You mentioned earlier a couple of
16 incidents where Ted had yelled at you, can you tell
17 me what you remember about what he said to you, like
18 what was he yelling at you or what he was saying?

19 A. It would be about the Memorandum of
20 Understanding. It would be about my complaints to
21 Sullivan. It would be about everything that I spoke
22 about, and he would come in to my office and just
23 have these, you know, tantrums and yell at me. And
24 repeatedly I would tell him that I didn't disrespect

1 him and he should not be disrespecting me. And I
2 mentioned that to Sullivan who did nothing about it.
3 I mentioned it to the Board and they did nothing
4 about it.

5 Q. Is there anything specific that Ted
6 said that led you to believe he was being
7 disrespectful?

8 A. Yes. He would come to my office and
9 yell at me to the point where I would have to tell
10 him you need to leave because you're not going to
11 yell at me without letting me -- we should be
12 discussing our concerns, not arguing about it and you
13 should not be coming into my office to yell at me.

14 Q. Is that everything that you can recall
15 what Ted would yell about?

16 A. It would be about different issues
17 because before I got to PAL, there was -- the way
18 that they would deal with problems, it was them
19 against us, it was civilian against police. And I
20 was trying to change that dynamic and we even had
21 a -- you know, Ted and I spoke about it and I'm like
22 it shouldn't be them against police -- you know, like
23 civilian against police.

24 The police were viewing it as a hostile

1 takeover from PAL to civilians because they would
2 implement programs and hire people to do their jobs
3 and the officers didn't like that because they like
4 working with the kids, they liked being involved with
5 the kids, and slowly but surely they were replacing
6 the officers with -- with civilian staff to do
7 certain activities that the officers actually enjoyed
8 doing with the kids.

9 So it was a very condescending
10 situation when I got there between the civilians and
11 the police. So we decided to have a retreat to try
12 to bring them together as one unit so that nobody is
13 arguing, nobody, you know, is fighting about petty
14 stuff. But the officers kept complaining that the
15 civilian staff, you know, would, you know, make
16 snarky remarks at them and they were not getting
17 along at all and we were trying to correct them.

18 So some of the stuff he would come in
19 and that would be about other stuff and he would be
20 like you need to go speak to this officer like ba,
21 ba, ba. So it could be about anything that he would
22 come in my office to yell about.

23 Some stuff like I would be like please
24 slow down, let's talk about this, what's going on.

1 But even stuff like that he would come in my office
2 to yell about when he was upset. And then towards
3 the end of me being there was more so about me
4 complaining about the stuff that I was complaining
5 about. So he would come in there and try to provoke
6 me into an argument and I would tell him -- I'd say
7 what I have to say to my boss and, you know, this is
8 my decision on this, you know, and they just
9 didn't -- they were getting more and more agitated,
10 and especially got agitated once we received notice
11 that the MOU was about to -- we were about to have
12 this meeting about the MOU which was going to be
13 negotiated anyway, but the MOU had just came out, so
14 he came in there yelling and I told Sullivan when I
15 spoke to Bernie and -- and Bernie Prazencia and Ron
16 Rabena I explained to them as well the stuff that Ted
17 was doing.

18 Q. Do you know who drafted the MOU?

19 A. It was drafted by the commissioner's
20 legal advisor and the City Solicitor's office.

21 Q. Do you know the name by any chance --

22 A. I believe the City Solicitor looked at
23 it, made the final determination --

24 THE COURT REPORTER: I'm sorry, who

1 made the final determination?

2 THE WITNESS: I believe the last person
3 to review it was the City Solicitor's office
4 before it came back to Commissioner Ross.

5 BY MR. GOLDEN:

6 Q. Do you know by any chance by name who
7 drafted either one of those and who drafted in those
8 offices?

9 A. I know from the -- from the person --
10 the captain that was assigned to draft it from Ross
11 was the legal advisor Fran Healy.

12 Q. And just so I can close the loop on
13 this, Ms. Cintron, is that everything you recall
14 about the incidents where Ted would yell at you?

15 A. Yes.

16 MR. GOLDEN: Thank you, Ms. Cintron.

17 That is all the questions I have.

18 THE WITNESS: Okay. Thank you.

19 MS. ULAK: I don't have any more
20 questions.

21 MR. GOLDEN: Ike, can we break?

22 MR. GREEN: Yes.

23 THE VIDEOTAPE OPERATOR: The time is
24 3:57 p.m., we are off the record.

1 * * * * *

2 (This concludes the deposition of
3 Evelyn Cintron at 3:57 p.m.)

4 * * * * *

5 MR. GOLDEN: I would like a copy. Can
6 you e-mail that?

7 THE COURT REPORTER: Sure. Normal
8 delivery everyone?

9 MS. ULAK: That's fine.

10 MR. GOLDEN: Yes.

11 MR. GREEN: We'd like to read and sign.

12 THE VIDEOTAPE OPERATOR: I just need to
13 know who will be ordering the video.

14 MR. GOLDEN: This is Kevin Golden for
15 PAL, I don't believe we'll be ordering this
16 one at this time.

17 MR. GREEN: Not at this time. We may
18 later. We just need the transcript right now.

19 MS. ULAK: Yeah, I think -- I guess
20 I'll take the video. I did order it.

21 * * * * *

22 (Whereupon, Exhibit City-1, City-2,
23 City-3 and City-4 were marked for
24 identification.)

C E R T I F I C A T I O N

I hereby certify that the proceedings and evidence noted are contained fully and accurately in the stenographic notes taken by me upon the foregoing matter dated _____2023, and that this is a correct transcript of the same.

RENEE SCHUMANN
CERTIFIED COURT REPORTER
LICENSE NUMBER: 30XT00005200

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